

**Consultation on the Environmental Standards for Inputs of Radioactive Substances into Groundwater**

February 2025

# How to respond

We would prefer you to respond to this consultation digitally via [SEPA’s consultation hub](https://consultation.sepa.org.uk/communications/easr_charging_scheme_2024/start_preview?token=e65f6bd10ff3111d5b547cd1e88701f9c5881e47).

If you would prefer not to respond via our consultation hub, you can respond to this consultation by sending an email to radioactivesubstance@sepa.org.uk. If responding by email, please complete and return the [Respondent Information Form](https://consultation.sepa.org.uk/radioactive-substances-unit/consultation-on-the-environmental-standards-for-in/supporting_documents/Respondent_Information_Form_Consultation%20on%20the%20Environmental%20Standards%20for%20Inputs%20of%20Radioactive%20Substances%20into%20Groundwater.docx) with your response

If you wish to respond another way, please [contact us using our online contact form](https://www2.sepa.org.uk/contactus) or by phone: 0300 099 6699 and we’ll arrange for an Officer to call you back.

Responses must be submitted by midnight on the 5 May. Earlier responses are welcome.

# Handling your response

We would like to know if you are happy for your response to be made public. If you ask for your response not to be published, it will be regarded as confidential and treated in accordance with SEPA’s published [Privacy Policy](https://www.sepa.org.uk/help/privacy-policy/).

You can indicate your preference in the [Respondent Information Form](https://consultation.sepa.org.uk/radioactive-substances-unit/consultation-on-the-environmental-standards-for-in/supporting_documents/Respondent_Information_Form_Consultation%20on%20the%20Environmental%20Standards%20for%20Inputs%20of%20Radioactive%20Substances%20into%20Groundwater.docx).

# How we use your feedback

As Scotland’s principal environmental regulator, our purpose is to protect and improve Scotland’s environment in ways that, as far as possible, also contribute to improving health and well-being, and achieving sustainable economic growth. Our [Corporate Plan 2024-2027](https://beta.sepa.scot/about-sepa/who-we-are/our-performance/corporate-plan/) sets out our strategic ambition and priorities. Our [Annual Operating Plans](https://beta.sepa.scot/about-sepa/who-we-are/our-performance/annual-operating-plan-2024-2025/) set out how we will implement our priorities every year.

In delivering these priorities we engage with those who have an interest in and/or are affected by our regulations and duties. One way we engage is through formal consultations. This is your opportunity to tell us what you think about our proposals. The feedback we receive helps us to understand what matters most to people and how we can deliver our duties efficiently and effectively.

After the consultation closes, we’ll consider the information we receive before publishing a digest of responses through the “[We asked, You said, We did”](https://consultation.sepa.org.uk/we_asked_you_said/) section of our consultation website. This will close the consultation process by explaining how we have considered and, where appropriate, acted upon what we have heard.

# Introduction

We are seeking your views on our proposed updates to environmental standards for inputs of radioactive substances into groundwater. These standards will apply to radioactive substances activities regulated under the Environmental Authorisations (Scotland) Regulations 2018 (EASR).

The updates aim to ensure consistent regulation and robust protection for people, wildlife, and the environment. Your input will help shape policies for authorised activities in ways that safeguard Scotland’s natural resources.

# Background

In 2014 we published our [Position Statement (WAT-PS-10-01): Assigning Groundwater Assessment Criteria for Pollutant Inputs](https://www.sepa.org.uk/media/152662/wat_ps_10.pdf). WAT-PS-10-01 described the standards and methods we apply to protect groundwater from all potentially polluting activities. Section 6.2 (Assessing inputs of radioactive substances for the purposes of regulating under the Radioactive Substances Act 1993 (as amended)) of WAT-PS-10-01 focused on the standards and methods we apply when regulating radioactive waste disposal facilities. We set these standards to ensure that inputs of radioactive substances to groundwater from such facilities would meet our legal obligations under the Groundwater Directive (Directive 2006/118/EC) to prevent hazardous substances from polluting groundwater.

There have been several developments in legislation and policy in the 10 years since WAT-PS-10-01 was published, including an update to [WAT-PS-10-02](https://www.sepa.org.uk/media/izxccosj/wat-ps-10-02.docx) as well as to other SEPA guidance, which have prompted us to review the content of Section 6.2. We have also decided to publish our updated standards for radioactive substances inputs to groundwater separately from WAT-PS-10-02, to improve clarity, and our ability to keep both documents up to date.

# Our proposals

The policy statement aims to explain how, in regulating radioactive substances activities, SEPA meets the requirements of the Groundwater Directive.

The policy statement first gives some background about the relevant legislation and then explains the standards that we use. It then gives some further information on where the standards come from and how they should be used in an assessment.

Within the draft policy statement, the proposed environmental standards aim to establish clear thresholds for limiting inputs of radioactive substances into groundwater. These standards are designed to protect people, wildlife and the environment both, during the operational phases of authorised activities and after.

To implement these standards effectively, SEPA proposes a structured approach based on credible exposure scenarios. This methodology ensures that assessments are grounded in robust evidence and can be tailored to specific contexts.

The proposed standards align with national policies and international guidance, reflecting SEPA’s commitment to applying the latest scientific understanding to regulatory practices. These proposals are built on a foundation of widely recognised frameworks, including:

* [The UK Policy Framework (2024) for managing radioactive substances and nuclear decommissioning](https://assets.publishing.service.gov.uk/media/6632371769098ded31fca7c1/managing-radioactive-substances-and-nuclear-decommissioning-uk-policy-framework.pdf).
* [Recommendations from the International Commission on Radiological Protection (ICRP), which provide a comprehensive framework for protecting public health and the environment from ionising radiation.](https://www.icrp.org/page.asp?id=5)
* [The International Atomic Energy Agency (IAEA) safety standards, which set best practices for managing radiation protection and ensuring safety across different scenarios.](https://www.iaea.org/resources/safety-standards)

This alignment ensures that SEPA’s regulatory approach remains consistent with international norms within Scotland’s unique environmental and legislative context.

Download our draft policy statement below.

[Environmental Standards for Inputs of Radioactive Substances into Groundwater](https://consultation.sepa.org.uk/radioactive-substances-unit/consultation-on-the-environmental-standards-for-in/supporting_documents/20250116Environmental_standards_for_the_input_of_radioactive_substances_into_groundwaterFINAL_FOR_CONSULTATION.docx)

# Questions

1. What is your name?
2. What is your email address?
3. Are you responding to this consultation on behalf of yourself, or a business or organisation?

If you are responding on behalf of a business or organisation, please provide the name below:

1. Are you happy for us to publish your response to this consultation?
2. How easy do you find the policy statement to read?
   1. Very easy
   2. Somewhat easy
   3. Neither easy nor difficult
   4. Somewhat difficult
   5. Very difficult

Do you have any suggestions to make the policy statement easier to read?

1. How easy do you find the policy statement to understand?
2. Very easy
3. Somewhat easy
4. Neither easy nor difficult
5. Somewhat difficult
6. Very difficult

Do you have any suggestions to make the policy statement easier to understand?

1. Do you agree that the proposed standards are sufficient to protect people, wildlife and the environment?
2. Yes
3. No

If no, please can you tell us more?

1. Do you agree that our proposed assessment approach is sufficient to protect people, wildlife and the environment?
2. Yes
3. No

If no, please can you tell us more?

1. Does the policy statement clearly show where we have derived our standards and assessment approach from?
2. Yes
3. No

If no, please can you tell us more?

1. How much do you agree that the guidance is internally consistent?
2. Strongly agree
3. Agree
4. Neither agree nor disagree
5. Disagree
6. Strongly disagree

Do you have any suggestions to make the guidance more consistent?

1. Do you want to say anything more about how the policy statement presents or explains our standards and approach?
2. Have you any suggestions for improving or expanding on our policy statement, so that it is sufficient to help us meet our objectives for regulating radioactive substances activities?

If you would like this document in an accessible format, such as large print, audio recording or braille, please contact SEPA by emailing [equalities@sepa.org.uk](mailto:equalities@sepa.org.uk)