**Radiation (Emergency Preparedness and Public Information) Regulations 2019 – Post Implementation Review**

The Department for Energy Security and Net Zero, with the Ministry of Defence and the Health and Safety Executive, is conducting a post implementation review (PIR) of the Radiation (Emergency Preparedness and Public Information) Regulations 2019.

We are seeking feedback to determine:

* whether the regulations meet their original objectives
* whether their scope is still appropriate and proportionate
* their impact on operators and whether there have been any unintended consequences
* whether any changes are required to achieve those objectives which imposes less regulation or to change what the regulations prescribe

This questionnaire contains **66 questions** with a mixture of multiple choice and free text boxes. Time required to collect your feedback will depend on the amount of detail you provide but could range from one to two hours. There are eight sections in total. There is option to save responses and come back to it later.

If you anticipate you will be providing detailed free text responses, it may be preferable to use this MS Word version to draft your response before submitting your response here.

Please complete by **24th September 2023.**  
  
**Background**  
REPPIR19 came into force on 22 May 2019 and replaced the previous 2001 Regulations. The policy objective of REPPIR19 is to ensure commensurate and proportionate emergency preparedness and response for the full range of nuclear and radiological emergencies including unforeseen events. 

To achieve this, it introduced a number of changes:

* *Revised definitions*: Introduced new definitions, including for ‘radiation emergency’ and ‘emergency worker’;
* *Consistent approach to assessing the full range of risks:*Introduced a risk assessment framework and consequence assessment methodology, creating a standardised approach for sites to assess the full range of risks from a radiation emergency.
* *Outline Planning Zones*: introduced the concept of outline planning zones.
* *Role of Local Authorities:*placed a duty on operators to provide information to local authorities on the consequence of an emergency from a site and gives local authorities the duty to develop and own offsite emergency planning arrangements.
* *National reference level:* sets guidelines for the level of radiation exposure for a year that emergency plans should aim to keep below in the extremely unlikely event of a radiation emergency.

If you would like to review the regulations in full, please find them at: https://www.legislation.gov.uk/uksi/2019/703/contents/made  
  
**Confidentiality and data protection**  
Information you provide in response to this call for evidence, including personal information, may be disclosed in accordance with UK legislation (the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). We will process your personal data in accordance with all applicable data protection laws and responders can withdraw their data at any point in the process. See our privacy policy (https://www.gov.uk/government/publications/desnz-consultations-privacy-notice/privacy-notice-relating-to-consultation-responses-received-by-desnz). In line with our privacy notice we may share your data with other organisations which have a direct interest in the regulations: for example Ministry of Defence, the Health and Safety Executive and the Office for Nuclear Regulation. We will summarise all responses and publish this summary on GOV.UK alongside the post implementation review documents. The summary will include a list of names of organisations that responded, but not people’s personal names, addresses or other contact details.

# Section 1. About you

Please complete the following questions so that we can understand your responses in the context of your role and organisation.

1. **In what capacity are you responding?** *Please indicate using the red font colour e.g on behalf of a single organisation.*

* On behalf of a single organisation
* On behalf of a representative group, network or other body that covers multiple organisations
* On your own behalf, as an individual worker
* On your own behalf, as a citizen

1. **What is the name of the organisation you work for or organisation you are representing?**
2. **What is your email address?**
3. **If you are an operator please indicate the type of site you operate** (*Please indicate using the red font colour)***:**

* Civil Nuclear
* Defence
* Radiological
* Other
* N/A not an operator

1. **Approximately how many people work in your organisation?** *(Please indicate using the red font colour).*

* 1 (self-employed)
* 2-9
* 10-49
* 50-249
* 250-499
* 500-999
* 1000 or more
* Don't know
* Not applicable

1. **What is your job role?**
2. **Does REPPIR19 place duties on your organisation?** (*Please indicate using the red font colour)*
   * Yes
   * No
   * I don’t know
   * Not applicable

# Section 2 - Regulatory objectives

This section includes general questions on whether REPPIR19 has met its objective as well as questions on specific changes introduced by REPPIR19.

1. **To what extent do you agree or disagree with the following statement: the introduction of Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPIR19) in Great Britain has improved radiological protection of members of the public and workers in the event of a radiation emergency.** (*Please indicate using the red font colour)*

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know / Prefer not say
* Not applicable

1. **If you disagree, please explain why?**
2. **To what extent do you agree or disagree with the following statement: REPPIR19 enables your organisation to deliver commensurate and proportionate emergency preparedness and response for the full range of nuclear and radiological emergencies including for unforeseen events.** (*Please indicate using the red font colour)*

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know / Prefer not say
* Not applicable

1. **If you disagree, please explain why?**

**SPECIFIC QUESTIONS ON 2019 CHANGES**

*The following questions relate to specific changes introduced by the 2019 regulations.*

**Definitions (Regulation 2(1))**

REPPIR19 introduced a modification of the definition of radiation emergency, removed the reference to ‘radiation accidents’ and introduced the term ‘emergency worker’.

1. **In your opinion, has the definition of ‘radiation emergency’ and ‘emergency worker’ in REPPIR19** (*Please indicate using the red font colour)***:**

* Improved emergency preparedness and response arrangements for radiological emergencies
* Worsened emergency preparedness and response arrangements for radiological emergencies
* Made no difference
* Don’t know / Prefer not say
* Not applicable

1. **To what extent do you agree or disagree with the following statement: The Approved Code of Practice (ACOP) and guidance for regulation 2 helps me comply with the regulations.** (*Please indicate using the red font colour)*

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know / Prefer not say
* Not applicable

1. **If you disagree, how could the ACOP and guidance be improved?**
2. **Please provide any additional comments you have on regulation 2.**

**Hazard Evaluation (Regulation 4)**

REPPIR19 removed references to ‘reasonably foreseeable’ radiation emergency and strengthens the requirements for operators to assess all hazards arising from work undertaken which have the potential to cause a radiation emergency.

REPPIR19 also introduced a new risk assessment framework and consequence assessment methodology, including requirements to produce a written hazard evaluation. Through the azif an identified radiation emergency occurred. The evaluation should determine the nature, form and quantity of radioactive material that would be released (the source term or terms). The operator must provide the regulator with the details of the evaluation made under paragraph (1) within 28 days of the date on which it is made.

1. **Do you agree or disagree that these changes provide for a consistent approach to assessing the full range of radiation risks?** (*Please indicate using the red font colour)*

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know / Prefer not to say
* Not applicable

1. **If you disagree, how could a more consistent approach to assessing the full range of radiation risks be provided?**
2. **To what extent do you agree or disagree with the following statement: The ACOP and guidance for regulation 4 helps me comply with the regulations.** (*Please indicate using the red font colour)*

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know / Prefer not say
* Not applicable

1. **If you disagree, how could the ACOP and guidance be improved?**
2. **Please provide any additional comments you have on regulation 4.**

**Consequence Assessment (Regulation 5)**

REPPIR19 introduced a new requirement on the operator to make an assessment, in accordance with Schedule 3, to consider and evaluate a full range of possible consequences of the identified radiation emergencies, both on the premises and outside the premises, including the geographical extent of those consequences and any variable factors which have the potential to affect the severity of those consequences. The consequence assessment must be completed within two months after the day on which the hazard evaluation required by regulation 4 is completed.

1. **In your opinion, what has been the impact of the consequence assessment?** (*Please indicate using the red font colour)*

* It has strengthened the basis for dutyholders emergency planning and response
* It has weakened the basis for dutyholders emergency planning and response
* Made no difference
* Don’t know / Prefer not say
* Not applicable

1. **If you feel it has weakened dutyholders emergency planning and response, please provide further information as to why.**
2. **To what extent do you agree or disagree with the statement: The ACOP and guidance for regulation 5 helps me comply with the regulations.** (*Please indicate using the red font colour)*

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know / Prefer not say
* Not applicable

1. **If you disagree, how could the ACOP and guidance be improved?**
2. **Please provide any additional comments you have on regulation 5.**

**Consequence Report (Regulation 7)**

REPPIR19 introduced a requirement for an operator to produce a consequence assessment following their hazard evaluation. The contents of the consequence report are set out in Schedule 4.

1. **In your opinion, what has been the impact of the consequence report?** (*Please indicate using the red font colour)*

* It has strengthened dutyholders emergency planning and response
* It has weakened dutyholders emergency planning and response
* Made no difference
* Don’t know / Prefer not say
* Not applicable

1. **To what extent do you agree or disagree with the following statement: The ACOP and guidance for regulation 7 helps me comply with the regulations.** (*Please indicate using the red font colour)*

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know / Prefer not say
* Not applicable

1. **If you disagree, how could the ACOP and guidance be improved?**
2. **Please provide any additional comments you have on regulation 7.**

## Detailed Emergency Planning Zone (Regulation 8)

REPPIR19shifts the responsibility for determining the detailed emergency planning zone to the local authority. Regulation 8 states the local authority must determine the detailed emergency planning zone informed by the operator’s recommendation made under paragraph 2 of Schedule 4.

1. **Is it your opinion that changes in responsibility for determining the detailed planning zone have** (*Please indicate using the red font colour)***:**

* Improved emergency preparedness and response arrangements for radiological emergencies
* Worsened emergency preparedness and response arrangements for radiological emergencies
* Made no difference
* Don’t know / Prefer not say
* Not applicable

1. **To what extent do you agree or disagree with the following statement: The ACOP and guidance for regulation 8 helps me comply with the regulations.** (*Please indicate using the red font colour)*

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know / Prefer not say
* Not applicable

1. **If you disagree, how could the ACOP and guidance be improved?**

## Please provide any additional comments you have on regulation 8.

## Outline Planning Zone (Regulation 9)

REPPIR 19 introduced outline planning zones and for some facilities default distances. It introduced different requirements for ONR-enforced sites, HSE-enforced sites and defence sites.

1. **In your opinion do the outline planning zones ensure proportionate and commensurate planning for the full range of nuclear and radiological emergencies?** (*Please indicate using the red font colour)*

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know / Prefer not say
* Not applicable

1. **To what extent do you do you agree or disagree with the following statement: The planning zones and default distances used to inform them in GB are fit for purpose.** (*Please indicate using the red font colour)*

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know / Prefer not say
* Not applicable

1. **Please provide any additional comment you may have on planning zones and the default distances used to inform them.**
2. **In your opinion are there any zones and/or default distances that would be preferable?**
3. **To what extent do you agree or disagree with the following statement: The ACOP and guidance for regulation 9 helps me comply with the regulations.** (*Please indicate using the red font colour)*

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know / Prefer not say
* Not applicable

1. **If you disagree, how could the ACOP and guidance be improved?**
2. **Please provide any additional comments you have on regulation 9.**

**Reference levels (Regulation 20)**

REPPIR19 requires the operator’s emergency plans and the local authority’s off-site emergency plans to record reference levels in order to prioritise reducing doses to emergency workers and members of the public below an effective dose of 100 mSv, or in exceptional circumstances below an effective dose of 500 mSv.

1. **To what extent do you agree or disagree that this requirement supports emergency response planning** (*Please indicate using the red font colour)***:**

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know / Prefer not say
* Not applicable

1. **If you disagree, please provide a brief description as to why.**
2. **To what extent do you agree or disagree with the following statement: The ACOP and guidance for regulation 20 helps me comply with the regulations.** (*Please indicate using the red font colour)*

* Strongly agree
* Agree
* Neither agree nor disagree
* Disagree
* Strongly disagree
* Don’t know / Prefer not say
* Not applicable

1. **If you disagree, how could the ACOP and guidance be improved?**
2. **Please provide any additional comments you have on regulation 20.**

# Section 3 – Unintended consequences

1. **Are you aware of any unintended consequences (positive or negative) arising from the Radiation (Emergency Preparedness and Public Information) Regulations 2019.** (*Please indicate using the red font colour)*

* Yes
* No
* Don’t know / Prefer not say
* Not applicable

1. **If yes, please provide a brief description**

# Section 4 - Costs

The original impact assessment of REPPIR19 changes identified the following direct cost for businesses:

* Familiarisation costs
* Preparation of information for the Local Authority (LA)
* Engagement with the LA
* Enhancing existing planning capabilities
* Off-site planning capabilities at sites with no-exisiting offsite plans
* On-site Planning
* Testing and Exercising

Details of the costs identified by the Impact Assessment can be seen on p.62 in the *Revised requirements for radiological protection: emergency preparedness and response -Government response* available here: <https://www.gov.uk/government/consultations/revised-requirements-for-radiological-protection-emergency-preparedness-and-response>.

1. **Are you aware of any other costs arising directly from REPPIR19 changes?** (*Please indicate using the red font colour)*

* Yes
* No
* Don’t know / Prefer not say
* Not applicable

1. **If yes, please provide a brief description, and estimated cost, for those other costs areas. For example administration costs, additional staff costs.**
2. **Who in your organisation is** **completing the requirements required by REPPIR19? If possible, please provide their job title(s) and/or full hourly wage cost. If there is more than one person, what is the estimated split of time between the different employees?**
3. **In the impact assessment cost assumptions were made in each of the 7 cost categories across three sectors.**

* **Civil Nuclear**
* **Defence Nuclear and non Nuclear**
* **Radiological**

**The availability of stable iodine tablets in the Outline Planning Zone was identified to be the largest contributor to costs in enhancing existing off-site planning capabilities at sites with existing off-site plans**.

**What approximately was the additional cost per year to your organisation per site for enhancing existing off-site plans? Please select from range below.** (*Please indicate using the red font colour)*

* £0,000- £10,000
* £10,001-£50-000
* £50,001-100,000
* £100,001-£200,000
* £200,001-£250,000
* £250,001-£300,000
* Don’t know / Prefer not say
* Not applicable

1. **How much of this cost was for stable iodine tablets? Please select the range below.** (*Please indicate using the red font colour)*

* £0-£20,000
* £20,001-£40,000
* £40,001-£60,000
* £60,001-£80,000
* £80,001 or more
* Don’t know / Prefer not say
* Not applicable

Radiological sites please answer question 53

1. **Cost assumptions in the original impact assessment identified that additional costs in year one of preparation of information for the local authority for radiological sites to be approximately £7,500 a year and ongoing costs of approx. £600. In your opinion, per radiological sites is this** (*Please indicate using the red font colour)*
   * + - * Much too high
         * Too high
         * About right
         * Too low
         * Much too low

* Don’t know/ Prefer not say
* Not applicable

1. **Do you have any other comments on the assumptions or the cost estimates in the Impact Assessment? If yes, please provide further detail.**

# Section 5 - Compliance levels

1. **Are there any particular aspects of the current regulations that your organisation finds difficult to comply with?** (*Please indicate using the red font colour)*

* Yes
* No
* Don’t Know/ Prefer not say
* Not applicable

1. **If yes, please explain which aspects are difficult to comply with and why.**
2. **If you have an alternative suggestion for how a particular aspect of the regulations could be improved, please enter this below.**

# Section 6. Burden on Businesses

1. **In your opinion, could the aims of the Radiation (Emergency Preparedness and Public Information) Regulations 2019 be achieved with a system that imposes less burden on business?** (*Please indicate using the red font colour)*

* Yes
* No
* Don’t Know/Prefer not say
* Not applicable

1. **If you think the aims of the regulations could be achieved with a system that imposes less burden on business, please explain how in the box below.**

# Section 7 – Approved Code of Practice (ACOP) and Guidance

1. **To what extent do you agree/ disagree with the following statements?** (*Please indicate using the red font colour)*

* **The ACOP was easy to find**:
* strongly agree
* agree
* neither disagree or agree
* disagree, strongly disagree
* don’t know/prefer not to say
* Not applicable
* **The ACOP was easy to understand**:
  + strongly agree
  + agree
  + neither disagree or agree
  + disagree, strongly disagree
  + don’t know/prefer not to say
  + Not applicable
* **The ACOP was comprehensive:**
  + strongly agree
  + agree
  + neither disagree or agree
  + disagree, strongly disagree
  + don’t know/prefer not to say
  + Not applicable
* **The ACOP was easy to implement**:
  + strongly agree
  + agree
  + neither disagree or agree
  + disagree, strongly disagree
  + don’t know/prefer not to say
  + Not applicable

1. **Are there any particular aspects of the REPPIR19 ACOP and guidance that your organisation finds difficult to comply with or interpret?** (*Please indicate using the red font colour)*

* Yes
* No
* Don’t Know/prefer not to say
* Not applicable

1. **If yes, please explain which aspects are difficult to comply with and why.**
2. **If you have an alternative suggestion for how a particular aspect of the ACOP and Guidance could be improved, please enter this below.**

Section 8 - Further comments

1. **Did you feel you had sufficient input into consultations (during 2017-2019) and shaping the REPPIR19 regulations?** (*Please indicate using the red font colour)*

* Yes
* No
* I don’t know/prefer not to say
* Not applicable

1. **If you have any additional feedback on the consultation process, please provide in the box below.**
2. **If you have any further observations or comments about the Radiation (Emergency Preparedness and Public Information) Regulations 2019 and the ACOP and Guidance, please enter these below.**