I understand that some readers of our response to the current shortage of medical isotopes may be arriving at different interpretations of its meaning and intent. Let me emphasise that:

- we confirm that if you need to purchase and keep radionuclides beyond those allowed for by your registration, you can and should do so now.
- we expect that applications for variations to authorisations will be rare - we hope and expect that there won't be any. This is because we are confident that in most cases authorisation holders will be able, quickly and easily, to confirm that any new combination of discharges they intend by way of a response to these shortages will not increase the radiological impact of their disposals above that which would have resulted from releases made at the limits of their extant authorisation. Once we have received that confirmation, we will then, promptly, respond and so give authorisation holders the comfort of knowing that we will not subsequently take enforcement action. Our responses will say:

“Thank you for your review of your organisation's proposed response to the current and anticipated shortage in medical isotopes. You explain that in order to meet your clinical and patient needs, you propose to change temporarily the amount and range of medical isotopes which you will to dispose to sewer [and by transfer for off-site incineration] [and which you will accumulate as waste] following or resulting from their preparation or administration to your patients. You have confirmed your assessment that the overall radiological impact of your disposals to sewer, because of these changes, will not increase beyond that which it would have been as a result of making disposals at the limits of your authorisation. [You also explain that your incineration contractor is able and willing to receive waste containing that different range and amount of radionuclides] [And you confirm that you will be able to manage adequately your proposed accumulation of waste]. I can confirm that in these circumstances, and given your review, the Environment Agency will not take enforcement action against you should you proceed to respond in this way. [Other than in respect of the continued accumulation of waste generated as a result of your response,] [When the supply of medical isotopes has returned to normal, we expect that you will resume compliance with the limits and conditions of your permits.”

Our core message to the health care community is:

- decide what you need to do to deal with this hiatus in supply (arrange supplies, re-calibrations, etc), and
- if you need and can get different radionuclides to meet your patients' needs, you should get them
- run a quick check on the radiological impact which would result from the use of different radionuclides, and
- let us know what you are doing.

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