



9 January 2026

By Email to HSCS.committee@Parliament.Scot

Health, Social Care and Sport Committee

Please find below the response in relation to **The Civic Government (Scotland) Act 1982 (Licensing of Non-surgical Procedures) Order 2026** on behalf of The Royal Environmental Health Institute of Scotland.

In general, the Institute has no issues to raise but wishes to comment on the fact that this will be a separate licence (i.e. in addition to a skin piercing licence). As a result, there will be premises that require both licences, for example where tattooing and laser tattoo removal are carried out, or where a beautician provides electrolysis and semi-permanent make-up (licensed under the Skin Piercing Order) alongside microneedling and IPL hair removal (which would require the new licence).

This will result in two separate visits by Environmental Health Officers to process the licences and will effectively double the cost for affected businesses.

We would also welcome clarification on whether the section relating to lasers is intended to cover tattoo removal.

Thank you.

Yours faithfully

Jackie McCabe
Chief Executive



The Royal Environmental Health Institute of Scotland (the Institute) has been in existence for over 150 years and has around 500 members the majority of whom are Environmental Health Officers working in that capacity for Scottish local authorities. The Institute is Incorporated by Royal Charter, is an independent self-financing organisation, is an independent awarding body for the profession and for a wide range of community training qualifications and is a registered Scottish charity (No. SC009406). The Institute neither seeks nor receives grant aid and its charitable activities are funded significantly by the subscriptions received from its members.

The objects for which the Institute is established are for the benefit of the community to promote the advancement of Environmental Health by:

- stimulating interest in and disseminating knowledge concerning Environmental Health;
- promoting education and training in matters relating to Environmental Health; and
- maintaining, by examination or otherwise, high standards of professional practice and conduct on the part of Environmental Health Officers in Scotland.

Environmental Health Officers in Scotland are part of a graduate only profession and by virtue of their under-pinning academic education, professional practical training, professional qualifications and experience are well placed to apply a holistic public health approach to the education of the public and to the enforcement of a wide range of environmental and public health legislation.

The Institute is an independent awarding body for the profession and currently accredits the BSc (Hons) Environmental Health degree delivered at the University of the West of Scotland, which is unfortunately in the process of being phased out. However, the Institute now accredits two MSc Environmental Health programmes delivered at Abertay University.

Environmental Health students, both undergraduate and postgraduate, who wish to pursue a career as an Environmental Health Officer are required to undertake a period of professional practical training and successfully complete the Institute's Professional Examination, which determines their competence to practise.