# HERCA

Heads of the European Radiological protection Competent Authorities

## Outcome HERCA workshop on the implementation of RPE and RPO

#### HERCA workshop, Paris, 6-8 July 2015

Organised by the HERCA Task Force on Education & Training in Radiation Protection in the framework of the HERCA Action Plan in relation to the transposition and implementation of Directive 2013/59/Euratom (Euratom-BSS)

This presentation reflects the outcomes of the workshop and is not a HERCA opinion







6th EUTERP workshop September 30- October 2, Athens

### **Objectives of the workshop**

- Explore a common understanding of the new requirements on RPE/RPO
- Exchange national approaches relating to the implementation of the BSS on RPE/RPO. Whenever possible, to identify good practices with national implementation of RPE/RPO
- Develop recommendations, to be approved by HERCA, to facilitate implementation of BSS on RPE and RPO. To be sent to national authorities.
- Comment on the draft guidance from ENETRAP III
- Develop a joint vision on future ambitions of HERCA on RPE/RPO: duties, harmonisation (registration, other)



## Sharing international experience Conclusions

- The BSS Directive sets up a common framework for RPE and RPO but offers a lot of flexibility for their implementation.
- Implementation of the BSS will be based on existing national systems of qualified experts and advisors systems. It is therefore nearly inevitable that true harmonization over all nations and competence levels will not be achieved.
- For the implementation of the directive a graded approach (low to high risk) and differentiation by field of application (medical, nuclear, industrial, ...) is clearly needed
- Different levels of qualification, competencies or training are required



## Sharing international experience Conclusions continued

- All countries have achieved a comprehensive assessment of the directive and of the modifications needed to fulfil the compliance for RPE/RPO
  - Most countries have existing systems which are close to RPE/RPO systems
  - A recognition process of RPE is already in place in many countries
    - It may concern an individual or an organization
    - The recognition is usually valid for 5 years but this may vary from 3 years for a junior expert to life
  - In some countries the RPE can act as an RPO
  - Strong opinions were expressed about the link between RPE and MPE in the medical field
    - Some countries consider that RPE and MPE must be completely separated and are fully incompatible

HFRC

• Others consider that RPE and MPE must be the same person

## Sharing international experience **Conclusions continued**

- All countries have achieved a comprehensive assessment of the directive and of the modifications needed to fulfil the compliance for RPE/RPO
  - The RPO is a new function in BSS, although it exist in all countries more or less
    - The implementation in each country will be based on existing systems or functions
    - Some countries will set up a recognition process for RPO, some already have it
  - Regarding Education and Training
    - •minimal requirements are or will be defined in each country
    - In most cases, adjustments will be needed
    - According to the system implemented, the requirements may be more or less complex
    - •A guide from ENETRAP is considered to be a useful document (reference for many countries)
  - Recognition of an RPE by another country
    - Difficult, given the differences that exist between countries (language, national legislation) but bi- and multilateral recognition on some special qualifications already exist HFRC

## Checking the understanding of BSS requirements: topics discussed

- The role of the RPE focusing on its advisory component: analysis of the concept of advice, independence of RPE and RPO from undertaking;
- The difference in roles of RPE-RPO
- The relation with MPE
- The concept of graded approach in roles and responsibilities of RPE/RPO in various sectors
- The concept of graded approach in recognition of RPE/ RPO.



## Checking the understanding of BSS requirements: outcome

 Consultations with a radiation protection expert, tasks for the undertaking

#### Recommendations

- Undertakings should present the result of the consultations of RPE to the internal committee in charge of Health, Hygiene and Security ;
- The advice provided by the RPE have to be written and controllable (consultation in quality insurance program undertaking)
- External expert may be used (small facility)
- The RPE should be independent, but the RPE can be employed by the undertaking (RPE should be on the same level as the management).
- The knowledge of RPE should help the undertaking to achieve optimization.



## Checking the understanding of BSS requirements

Recognition of services and experts

#### Recommendations

- The recognition system can be different
  - the nature of the practice and the corresponding stakes, and
  - the staff and competence needed for radiation protection issues (graded approach)
- In order to facilitate recognition of RPE by Member States and based on ENETRAP guidance it should be helpful to come to consensus on the following items:
  - Type of academic disciplines suitable for educational requirements for RPE
  - Minimal requirements needed in the field of specific radiation protection training for RPE

HFRC

- Minimal requirements for professional experience needed for RPE
- How to demonstrate knowledge of the country-specific legislation



## Checking the understanding of BSS requirements

Radiation protection experts

#### Recommendations

- Classify the relevant issues at a national level (graded approach)
- The training and retraining process of RPE
- Define which RPE tasks can be performed by an RPE employed by the undertaking and which need an RPE in an independent status



## **Checking the understanding of BSS** requirements

Radiation protection experts

#### **Recommendations** continued

- The advices provided by RPE (in addition to art 32 and 68) on the relevant issues have to be written and controllable
- Undertakings should present the result of the consultations of RPE to the internal committee in charge of Health, Hygiene and Security
- Guidance on training is needed : arrangements for prevention of accidents and incidents, preparedness and response in emergency exposure situations, preparation of appropriate documentation such as prior risk assessments and written procedures, and quality assurance. HFRC

## Checking the understanding of BSS requirements

Radiation protection officers

#### Recommendations

- Graded approach for designation of RPO could depend on authorisation system (licensing, registration, notification)
- Harmonisation of learning outcomes is necessary to enable European exchange of RPO's
- Need guidance for RPO training? Basic training?
  - Basic education and training for RPO should be developed by ENETRAP



## ENETRAP III activities related to RPE/RPO

#### **Exchanging with the ENETRAP team**

- Establishment of an RPE recognition scheme /framework
- Steps in recognition according to ENETRAP
- Criteria for mutual recognition
- Training and competency of an RPO



## ENETRAP III activities related to RPE/RPO

#### Exchanging with the ENETRAP team

#### Conclusions

- Aim of the discussions is to find a common approach between the MS
- Harmonisation or standardisation of the implementation of RPE/RPO for every country and every application sector is not realistic.
- Graded approach in RPE recognition must be applied in term of sectors.
- Guidelines (best practices and options) will be useful for MS nevertheless recognition need to be flexible in order to take into account the culture of the country.



#### Conclusions of HERCA Workshop on RPE/RPO: duties, harmonisation (recognition, other)

#### RPE

- The BSS describes the RPE at a general level (appropriate knowledge, training and experience in order to give advice in RP)
- The BSS does not specify detailed requirements in terms of education, training and experience for the RPE.
- The tasks of the RPE are well documented.
  - The ENETRAP reference training scheme should provide a good model for the knowledge and theoretical competence.
  - With other training schemes and on the job training at the workplace one can also achieve the required competencies.
- Further guidance is needed to describe the workplace competencies required to fulfil the tasks given in BSS.
  - These competencies need to be mapped to the relevant knowledge and skills given in the ENETRAP training scheme.



#### Conclusions of HERCA Workshop on RPE/RPO: duties, harmonisation (recognition, other) continued

#### **RPE** continued

- First priority has to be given to the work needed for the implementation of the BSS
- Mutual recognition could be developed once the new guidance has been developed
- Once the new BSS has been implemented and guidance developed, a new survey should be done by the HERCA TF on E&T

#### RPO

 Further guidance should be developed for RPOs including core competences and practical experience specific for different types of practices for implementation BSS



## **Concluding key points workshop**

- The harmonisation of national legislation/regulation could not be a realistic objective because of the great flexibility of the RPE/RPO requirements, requested by MS
- 2. Existing regulations of MS need to be updated. The BSS directive allows a multitude of options for implementation, particularly on the RPE recognition system.
- 3. No serious issues have been identified for the transposition works, RP authorities share a general common understanding of the relevant requirements.



## **Concluding key points workshop**

- 4. The graded approach has to be developed further in the definition of tasks and roles of RPE and RPO, and on the implementation and development of the education and training strategy.
- 5. The ENETRAP III guidance on RPE/RPO (supported by the Commission) could be a reference for E&T in RP in Europe
  - Facilitate HERCA members to go towards a common approach.
  - The promotion of the ENETRAP guidance, as an EU framework on E&T in RP, should be encouraged both for the implementation or updating of educational syllabi and development of ongoing training for RPE and RPO



## **Concluding key points workshop**

 The topic of "mutual recognition" of RPE and RPO has to be further investigated, identifying sectors and number of RPE and RPO concerned, bilateral arrangements being already possible in some MS



## **Concluding remarks**

- There is no need for additional HERCA recommendations for RPE implementation and requirements in education/training
- However, the understanding of the situation in each country will allow to have a look at international good practices and will be the first step towards a *mutual approach in E&T*
- Regarding the implementation of the BSS requirements, the goal is to achieve a common understanding and approach in E&T of RPE and RPO whilst respecting the differences that exist in the different MS
- Regarding recognition, the BSS requires the MS to notify the EC of the recognition system that is set up by the country.
- After the transposition and implementation of the directive in 2018, it will be useful to have a look at the different recognition systems in place in the different MS.

