Radiological Protection Advisory Committee (RPAC)

Monday 8th December 2025 – Via MS Team

Special meeting

Members present:	Tom Ryan - EPA (Chair) John Tuffy – Health Information Quality Authority Mary O'Mahony – Health Service Executive Sean Curran – Medical Council Andrew Bolas – Dental Council Carol Robinson – Norwegian Radiation Protection Authority Gareth Thomas – UK Office of Nuclear Regulation John Upton – Irish Association of Physicists in Medicine Susan McCready-Shea – Society for Radiological Protection
EPA staff in attendance:	Carol O'Sullivan, Programme Manager, OEE David Fenton – Manager Radiation Protection Regulation, OEE Laura McEneaney – Inspector, OEE Catriona McCarthy - Inspector, OEE
Apologies:	Helen Hourihane – Health and Safety Authority Luis Leon Vintro - Royal Irish Academy Paula Barry Walsh - Veterinary Council Heinz Peter Nasheuer – Irish Radiation Research Society Wayne Anderson – Food Safety Authority of Ireland Michele Monahan – Irish Institute of Radiographers and Radiation Therapists Carole Rousse – French Radiation Protection Authority (Autorité de Sûreté Nucléair) Antony Bexon – UK Health Security Agency Paul Dorfman – Nuclear Free Local Authorities Stephen Thomas – Environmental Pillar
Secretary:	Catherine Scully

1. Welcome

Dr Tom Ryan, Chair of the Committee, opened this special meeting arranged to discuss the EPA's proposed procedure for the submission and assessment of requests for the justification of new practices involving ionising radiation.

A draft procedure was circulated to the committee in advance and following a presentation at the meeting by Laura McEneaney, a number of questions were posed to the committee.

1. Do you have any other considerations or comments on the four criteria outlined in the procedure?
2. Is the application and approval process in the draft procedure sufficiently detailed?

3. How will the potential detriments of a new practice be assessed against the benefits in applications?
4. What ethical considerations should be taken into account in the approval process?
5. Is there any further general advice based on your experience in terms of:
    - Types of sources that are used in non-medical human imaging (NMHI)
    - Stakeholder consultation

The following summarises the discussion with the committee members:

- The current criteria for the use of DXA in NMHI will not be replaced by the proposed procedure.
- It was suggested that the purpose of the justification procedure should be clarified.
- The proposed approach in terms of an internal review panel was welcomed.
- The importance of consultation with the correct stakeholders was discussed.
- The commission of research may be warranted for some new practices.
- Ethical considerations include:
    - Data protection
    - Informed consent
- A pilot of this process was suggested.
- It was also suggested not to make the criteria too detailed – due to possible overlap with the authorisation process.

The committee was not aware of any use of radioactive sources in NMHI, only the use of X-ray.

Some suggested changes to the draft procedure included:

- Making it clear if the procedure is for non-medical human imaging procedures only or if it is a general justification procedure and removal of the reference to "imaging procedure".
- Use of dose constraints can be more appropriate than dose limits.
- "The class or type" of practice should be included.
- Explain the RPR abbreviation.

The Chair thanked the committee for their valuable contributions and outlined the next steps, which are to update the procedure and present it to the EPA Board, asking them to note the process established for assessing a justification application.