



Radiation Health Committee

Meeting Minutes

Date	11 October 2021
Time	12:30 PM - 04:00 PM
Location	Microsoft Teams Meeting
Present	Dr Roslyn Drummond (Chair); Ms Fay Bellis (Public Representative); Mr Mark Carey (NSW); Mr Glenn Riley (VIC); Mr Simon Critchley (QLD); Mr Bradley Feldtman (NT); Ms Penny Hill (ACT); Dr Massey de los Reyes (SA); Dr Carl-Magnus Larsson (CEO of ARPANSA); Dr Stephen Newbery (TAS); Ms Hazel Upton (WA); Dr Joanna Wriedt (Nuclear Safety Committee Representative).
Absent	N/A
Observers	Dr Gillian Hirth (ARPANSA Deputy CEO); Dr Ivan Williams (Chief Medical Radiation Scientist, ARPANSA); Mr Jim Scott (Chief Regulatory Officer, ARPANSA), Mr Ryan Hemsley (A/g Chief of Staff –ARPANSA); Dr Rick Tinker (ARPANSA), Ms Lara Purdy (Department of Health); Mr Trent Furminger (Department of Health); Ms Katie Volter (Department of Health); Mr Nicholas Johnson (Department of Health); Dr Andreas Markwitz (New Zealand)
Secretariat	Ms Meaghan Partridge, Ms Helen Alexander, Mr James Wheaton, Mr Nathan Wahl.

1 - Welcome by the Chair

The Chair welcomed members and observers, and outlined the etiquette rules for a virtual meeting. The Chair acknowledged the work of outgoing RHC Secretary Dr Samir Sarkar and thanked him for his efforts and welcomed the new Secretariat. It was mentioned that the work of the Committee had been paused for some months while ARPANSA made changes to the governance structure for the Committee and also reviewed the structure of the Radiation Protection Series (RPS) publications, including the proposed new Regulatory Expectations publications.

2 - Conflict of Interest Declarations

No conflicts of interest were declared.

3 - Prior Minutes

The Chair noted that the minutes from the previous meeting held on 24-25 March 2021 were confirmed out-of-session and published on ARPANSA's website.

4 - Update from the CEO of ARPANSA

The CEO advised the RHC that he is leaving ARPANSA after 12 years at the end of his term in March 2022. Recruitment is underway with a new CEO expected to be appointed early next year.

The CEO described recent changes within ARPANSA affecting the governance of national uniformity issues and ARPANSA's relationships with the Australian Health Practices Principles Committee (AHPPC), the Standing Committee on Environmental Health (enHealth), and enHealth's Radiation Health Expert Advisory Panel (RHERP) as well as the RHC. The changes center on the establishment of a new internal coordinating Committee, which has broad membership from across ARPANSA, and will deal with the nexus between international and domestic issues and activities such as standards development.

The CEO also noted that ARPANSA is now working with the Department of Defence on the Australian Government's recent announcement regarding nuclear submarines. ARPANSA will provide input to Defence's Nuclear-Powered Submarine Taskforce in the areas where ARPANSA has relevant expertise, over the next 18 months.

The CEO proposed that, given the interruptions of Covid-19, the second half of 2023 was firming as an appropriate time for the International Atomic Energy Agency (IAEA) Integrated Regulatory Review Services (IRRS) follow up mission to review Australia's progress in addressing the findings from the 2018 mission.

The CEO met with the Chairs of enHealth and RHERP, to discuss how to accelerate progress on multi-jurisdictional recommendations from the 2018 IRRS mission and improve communication between RHC and enHealth. The CEO encouraged RHC members to contact their enHealth representatives to progress IRRS-related matters with the 2023 target.

5 - Incoming Correspondence

Members noted and discussed the following correspondence, both referred from the Radiation Health and Safety Advisory Council (the Council) to RHC:

- Request for guidance on ARPANSA's Code of Practice and Safety Guide for Radiation Protection in Dentistry, Radiation Protection Series No. 10 (RPS 10): Roisin McGrath, Melbourne Dental School, 8 June 2021.
- Request for revision of RPS 10: Australian Dental and Oral Health Therapists Association Ltd (ADOHTA Ltd.) and the Dental Hygienists Association of Australia Ltd (DHAA Ltd.)

The RHC discussed the work that had progressed on a review of RPS 10 which the RHC approved in 2018. It was noted that there are essentially two issues to be addressed from the correspondence:

1. A request for RHC to issue a statement to clarify regulatory approaches to OHT's. There are allegedly examples of OHT's being excluded from undertaking certain procedures, such as extra-oral radiographs, under current interpretations of RPS 10.
2. A request for a full review of RPS 10 – it was proposed that this be progressed following the revision of the RPS which would have a bearing on the review.

It was agreed that these issues need to be considered out-of-session.

Task: RHC to develop a statement to clarify the interpretation of 'Dentist' and Dental Practitioner in contrast to other roles such as OHT's, until a formal code revision is in place.

Task: Review the differences in regulation of dental practitioners in each jurisdiction.

6 - Member representing the interests of the general public

The member raised for discussion a recent ABC news item regarding the use of intense-pulsed light (IPL) and the burning of the skin of a woman's leg in Queensland, with cosmetic physicians calling for improved restrictions on IPL and cosmetic laser therapy.

The RHC noted that Queensland is considering regulation of IPL and other potentially dangerous laser sources. NSW noted the same issue came up in feedback as part of its recent *NSW Radiation Control Act 1990* review and will likely be considered as part of the regulations. ARPANSA also outlined the nascent work it is undertaking with the Monash University Accident Research Centre (MUARC), looking at injuries from non-ionising radiation in cosmetic use, following recent discussions at the Radiation Health and Safety Advisory Council which has issued advice to the CEO.

7 - Proposed enHealth and ARPANSA arrangements

Further to the CEO's update (at 4 above) and the meetings with enHealth, RHERP and the Department of Health, a draft letter was tabled for RHC's feedback. The letter describes the proposed enHealth and ARPANSA work arrangements, information exchange and workflow. It was agreed that, as enHealth and RHERP are not statutory bodies (unlike RHC), there needs to be agreement on how the groups interact.

ARPANSA and the RHC will maintain the Radiation Protection Series (RPS) and enHealth will look at strategic policy matters. ARPANSA will advise enHealth on emerging risks. The CEO of ARPANSA can channel advice from RHC and from the Radiation Health and Safety Advisory Council to enHealth, including emerging or existing radiation risks identified through national or international risk assessments. enHealth can use this information, taken as horizon scanning, and bring issues to AHPPC where opportunities for national consultation present.

Approval of nationally adopted codes will continue through the National Directory of Radiation Protection (NDRP) amendments, a process facilitated by enHealth.

Task: Document to be sent with changes discussed regarding the cooperative arrangements involving enHealth and ARPANSA.

8 – Radiation Protection Series (RPS) Framework Review

The RHC discussed a proposed new RPS framework, with ARPANSA noting that a new system is required as it is not sustainable from a resourcing perspective to maintain the current RPS.

The RHC discussed a number of issues around the functional implementation and application of the proposed new RPS Framework, from the perspective of each jurisdiction, that arise when contrasted against the existing framework. This included the structure and wording of the Regulatory Expectations documents.

ARPANSA proposed to send enHealth an issues paper outlining the challenges of the current system to ensure they are engaged and aware of jurisdictional input being sought via RHC. A paper would seek enHealth's endorsement for continued work including public consultation, and thereby help ensure a consolidated approach to a revised framework.

RHC discussed implications of not having certain industry or practice specific codes with agreement that these would be considered on a case-by-case basis. It was also noted that equipment standards and compliance standards will need to be considered around how they fit under the new framework.

Task: The CEO of ARPANSA present to and seek the endorsement of enHealth, for RHC to progress work on a proposed new RPS Framework with regulatory expectations, for enHealth to consider.

Task: Pending enHealth endorsement of the new RPS Framework, for ARPANSA to progress a public consultation via an Issues Paper of the RPS Framework and Regulatory Expectation documents with invitations to be sent to key stakeholders inviting comment.

9 - CT baggage scanners and personal dosimeters policy update

The RHC considered a paper tabled on the screening of personal radiation monitoring devices (PRMD) at airports, which can invalidate the record of radiation exposure dose for an individual. The RHC had previously agreed to issue a statement on PRMD screening by computed tomography (CT) baggage scanners used in airport security systems.

ARPANSA advised that the Department of Home Affairs (DHA) has responded favourably to the draft RHC statement. DHA has drafted guidance on the screening of personal radiation monitoring devices (PRMD) to the effect that they are not suitable for CT X-ray screening. In addition, DHA is working on an amendment to screening notices around screening of persons who possess PRMD.

The RHC discussed whether DHA still require a RHC statement in order to issue guidance. ARPANSA advised that DHA had requested more information which has now been provided, however that the proposed RHC statement would still help including for future and other applications. It was suggested that the statement be made more general, rather than specific to CT baggage scanners.

Task: Update the statement to refer to all scanners and circulate out-of-session for approval.

10 - Compliance Testing Standard

The RHC considered a paper tabled on uniform testing standards. It was proposed that an ARPANSA-facilitated general public consultation now occur, including the Australian College of Physical Scientists and Engineers in Medicine (ACPSEM) and Royal Australian and New Zealand College of Radiologists (RANZCR), as well as other key stakeholders, such as compliance testers and equipment manufacturers.

The RHC noted interim work undertaken by the working group, with jurisdictions invited to comment and request clarification on draft documents. The aim is to have an agreed position, including on testing frequency, with no expectations on adoption and timeframe and anticipate that the jurisdictions move towards a national standard. The RHC discussed a national approach to a regulatory impact statement, and the potential for the documents to be an RHC Technical Standard.

The Committee noted that while some jurisdictions are very confident about their own testing requirements, it is not envisaged all jurisdictions would adopt the standard immediately. It was noted that Automatic Mutual Recognition legislation will have an effect, and that it would be imperative to allow for a buffer period before the expiry of a current certificate of compliance.

Decision: RHC agreed for the document to go to public consultation via ARPANSA.

Task: RHC members to provide input of stakeholders for the public consultation.

Task: Amended draft to be presented at a RHC meeting in early 2022.

11 - Advisory Note: Explanation of Wellbeing

During the 2018 consultation process for the *Code for Disposal Facilities for Solid Radioactive Waste, RPS C-3* (the Disposal Facilities Code), ARPANSA identified the need to provide further advice on the interpretation of health and well-being. A draft Advisory Note was tabled describing how health and well-being should be considered as part of radiation protection.

The draft Advisory Note describes how the state of health and well-being of an impacted community throughout all stages of a proposed Disposal Facility informs the process of optimisation and decision making.

It was proposed that ARPANSA conduct a public consultation on a draft Advisory Note, including outreach to stakeholders, to provide an explanation of health and well-being as referred to in the Disposal Facilities Code.

Decision: The RHC agreed that ARPANSA conduct a public consultation, including outreach to key stakeholders.

Task: Proceed with consultation on the Draft Advisory Note for the Disposal Facilities Code, pending adjustments to the definitions of health and wellbeing.

12 - Advisory Note: Explanation of Incident

ARPANSA tabled a paper proposing that an Advisory Note is published to provide an explanation of 'incident' as referred to in the Code for Radiation Protection in Planned Exposure Situations (Rev. 1), RPS C-1 (the Planned Exposure Code).

ARPANSA noted that this advisory note was being developed as ARPANSA was reviewing their regulation of Commonwealth entities and contractors and was looking at the terms 'incident' and 'accident' which are widely used in the Planned Exposure Code (PEC) and other documents.

The RHC also discussed the need for a reporting mechanism for 'near misses', which some people may want to report voluntarily and could also help inform the prevention of accidents.

Decision: ARPANSA publish an Advisory Note to provide an explanation of 'incident' for the Planned Exposure Code.

13 - Advisory Note: Updating Dose Coefficients in RPS 9 and RPS 9.1

ARPANSA tabled a paper proposing to conduct a technical workshop in November 2021 with interested jurisdictions, including technical staff or consultants, to do three things:

- review a Draft Advisory Note on Changes to Dose Coefficients for Occupational Exposures,
- note the requirement to update the dose coefficients, and
- decide if ARPANSA's proposal – to update some nuclides based on International Commission on Radiological Protection (ICRP) recommendations, lead and polonium, but keep others, uranium and radium, consistent with RPS 9 and RPS 9.1 due to lack of conclusive information on chemical form in ICRP – is acceptable.

Subject to these, ARPANSA also proposed to withdraw out-of-date data and replace it with an Advisory Note for the new data provided on the RPS 9 and RPS 9.1 webpages located on the ARPANSA website. It was noted that the changes will most affect the mining and milling industries.

Decision: The RHC endorsed ARPANSA hosting a workshop to discuss the update of the RPS 9 and outcome to be presented at the next RHC meeting.

14 - Review of RHC Work Program and Action List

All items were noted as either completed, on hold, or on the agenda for the current meeting.

Task: ARPANSA to bring a revised action list and work program to RHC at next meeting.

15 - Any Other Business and Meeting Closure

The member representing South Australia informed the Committee that she will be standing down as she will shortly be leaving the Environment Protection Agency of South Australia.

There was discussion around the draft for the National Strategy. It was agreed that members are able to respond to this as individuals if they choose.

The date of the next Meeting is to be advised, however anticipated to be December 2021.