



Radiation Health Committee

MINUTES

Date:	16 November 2016
Time:	9:30 am to 4.30 pm
Location:	Queensland Department of Health, 15 Butterfield Street, Herston
Secretariat:	Dr Samir Sarkar
Scribe:	Ms Meaghan Partridge
Members:	Dr Roslyn Drummond (Chair); Dr Carl-Magnus Larsson (CEO of ARPANSA), Mr Keith Baldry (SA); Mr Ross Bevan (ACT); Mr Noel Cleaves (VIC); Mr Simon Critchley (QLD); Ms Hazel Upton (WA); Mr Len Potapof (NSW); Mr Bradley Feldtman (NT); Dr Stephen Newbery (TAS); Dr Peter Karamoskos (Public Representative); Dr Bruce Hocking (Member); Mr Robert Lyon (Nuclear Safety Committee Representative)
Invitees:	Dr Roger Allison (Chair – Radiation Health & Safety Advisory Council); Robert Guilfoyle (Communications – Office of the CEO); Alex Kalaiziovski ¹ (Leading Senior Regulatory Officer – Source Control); Dr Duncan Surin (WA)
Observers:	Dr Gillian Hirth (Chief Radiation Health Scientist); Mr Jim Scott (Acting Chief Inspector - Regulatory Services); Dr Ivan Williams (Chief Medical Radiation Scientist – Medical Radiation Services); Ms Tone Doyle (Chief of Staff – Office of the CEO); Mr Selva Kumar (Senior Officer Regulatory Policy – Regulatory Assurance); Ms Kathryn Scully (Senior Parliamentary and Government Relations Officer – Office of CEO); Dr Rick Tinker (Director – Assessment and Advice Section – Radiation Health Services); Ms Paula Veevers (Manager – Compliance and Approval Operations – Qld Radiation Health Unit.
Apologies:	Ms Hazel Upton (WA); Dr Samir Sarkar

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1. INTRODUCTION & STANDING ITEMS

Item 1.1 Welcome by the Chair

Chair

The Chair welcomed the Committee and observers and in particular, new members Mr Cleaves for Victoria and Mr Feldtman for the Northern Territory. The Chair also welcomed the Chair of the Radiation Health and Safety Advisory Council, Dr Allison. The Chair noted Ms Upton's apologies and the inclusion of Dr Surin as Ms Upton's alternate.

¹ Mr Kalaiziovski attended via telephone

Item 1.2 Minutes**Chair**

The Committee noted that the minutes from the previous meeting held on 15 June 2016 were confirmed out of session.

Item 1.3 Action & Business Arising**Chair**

The Committee was briefed on the status of the RHC action list and noted the following outstanding actions:

Action 21 – RHC Members to provide advice on process for approval – See Item 3.7

Action 23 – Awaiting response from WA and Tasmania – See Item 3.7

Item 1.4 Correspondence**Chair**

The Committee noted the following correspondence:

1. Energy Networks Association, response to regulation of Extremely Low Frequency (ELF) Electromagnetic Fields.
2. Mr Leif Dahlskog, WA representative, providing his notice of resignation from the RHC.
3. Outgoing letter to Department of Industry, Innovation and Science (DIIS) noting recent RHC members that could assist with the Waste Acceptance Criteria Working Group for a National Radioactive Waste Management Facility (NRWMF).
4. Acknowledgment email from DIIS for RHC suggested options to (NRWMF).
5. Comcare response to regulation of Extremely Low Frequency (ELF) Electromagnetic Fields.
6. Australian Council of Trade Unions (ACTU), response to regulation of Extremely Low Frequency (ELF) Electromagnetic Fields.
7. Outgoing letters to Environment Protection Authority NSW; Queensland Department of Health; Department of Health Western Australia; and Department of Health Northern Territory requesting nominations for RHC Membership.
8. Environmental Protection Agency NSW withdrawal of Radiation Health Series publications to adopt relevant International Atomic Energy Agency (IAEA) document.
9. Environmental Protection Agency NSW nominating Mr Len Potapof as their representative.
10. Department of Health Queensland nominating Mr Simon Critchley as their representative.
11. Outgoing letter to Department of Health Western Australia requesting nominations for RHC membership.
12. Outgoing letter to Queensland Department of Health acknowledging Mr Simon Critchley's nomination and enclosing Instrument of Appointment.
13. Outgoing letter to Environment Protection Agency NSW acknowledging Mr Len Potapof's nomination and enclosing Instrument of Appointment.
14. Outgoing letter to Laser Therapy & Natural Medicine Pty Ltd regarding IPL Laser Treatment Training enquiry.

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15. Mr Nehal Ahmed, NT Representative, providing his notice of resignation from the RHC.
16. Department of Health Western Australia nominating Ms Hazel Upton as their representative.
17. Outgoing letter to Department of Health Western Australia acknowledging Ms Hazel Upton's nomination and enclosing Instrument of Appointment.
18. Outgoing letter to Mr Nehal Ahmed from RHC Chair on behalf of RHC thanking him for his contribution and wishing him well in his new position.
19. Outgoing letter to Safe Work Australia in regard to updating Australia's radiation protection standards.
20. Safe Work Australia response to request to updating Australia's radiation protection standards.
21. Department of Health Northern Territory, nominating Mr Bradley Feldtman as their representative and Mr Xavier Schobben as the alternate.
22. Outgoing letter to Department of Health Northern Territory acknowledging their nominated representatives and enclosing Instrument of Appointment.

Item 1.5 Public Interest Issues

Dr Karamoskos

An issue was raised in regard to unauthorised personnel requesting diagnostic imaging. The practice in some hospitals has developed that, when the medical practitioner caring for a patient is not on site they may, over the telephone, request that a nurse (or clerk) submit a request for a diagnostic radiological procedure. The request may not contain the necessary clinical information that the radiologists need to be satisfied that the procedure is appropriate or justified. There may be an expectation to accept such a request, to avoid delaying the patient's treatment. It appears that this procedure is becoming more widespread and needs to be managed. The Chair drew the parallel with telephone prescription of drugs, where the prescribing medical practitioner is obliged to provide a written prescription to the pharmacy within 24 hours of the telephone request.

The Medical Code clearly defines the responsibilities of the referring medical practitioner and the radiologist. This practice would appear to be contrary to the requirements of the Medical Code. It was considered to be a matter for state regulators to ensure compliance with the Medical Code.

Item 1.6 Conflict of Interest Declaration

All Members

Nil

2. NATIONAL UNIFORMITY – ACTION/INFORMATION ITEMS

Item 2.1 2018 IRRS Mission to Australia

Dr Larsson

Dr Larsson provided an update noting that Tasmania, Victoria, Northern Territory and South Australia would participate. Final confirmation from Western Australia is pending.

The ARPANSA IRRS Project plan was presented to the ARPANSA Executive on 14 November. The dates for the mission have been confirmed as 4-16 November 2018. Most of the mission will take place in ARPANSA's Melbourne office.

Training for use of the self-assessment tool has been undertaken with Northern Territory; South Australia and Tasmania, with more training planned.

Dr Larsson met with Deputy Director General of IAEA who advised that the IAEA was very interested in the way ARPANSA has approached this review with the states and territories.

3. RHC WORK PROGRAM – ACTION/INFORMATION ITEMS

Item 3.1 Project Update Project Managers

All the projects were discussed under separate agenda items (see below).

The Committee agreed:

- to endorse the Planned Exposure Code with minor amendments
- to progress the document on Emergency Exposure Situations as a Guide by integrating the current RPS 7, or most of it
- that the Guide on Existing Exposure Situations to be prepared for public consultation
- to prepare the Medical Exposure Code for public consultation subject to OBPR endorsement
- Technical guidance on Control of IPLs and LASERs for cosmetic use is prepared
- that the NDRP Amendment 7 remains outstanding and will be finalised out of session

Item 3.2 Medical Exposure Code (MEC) Mr Critchley & Mr Thomas

Mr Critchley presented the revised version of the MEC which incorporates the comments received from the Committee, medical colleges and professional associations. Dental, chiropractic and research have not been included.

It was noted that the MEC needs to be explicit on the areas it will cover by way of a Glossary or Foreword. The consultation process will need to determine whether the code will include dental, chiropractic and research

The Committee agreed that the draft was ready to go out for broader consultation, contingent on OBPR endorsement.

Action 1: Glossary/Foreword and letter to be drafted to clearly explain the areas the MEC covers and determine if Dental, Chiropractic and Research should be included (MRSB/CEO/PT/IW)

Action 2: Glossary/Foreword and letter to be forwarded to RHC Members for comment/approval (MRSB/PT/IW)

Action 3: Submit Preliminary Assessment to OBPR (MRSB/PT/IW)

Action 4: MEC to be placed on ARPANSA website for public comment – ensure reasonable time for response of approximately two months (MRSB/PT/IW)

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Item 3.3 **Planned Exposure Code (PEC)**

Mr Baldry

Dr Baldry presented the revised version of the PEC and noted that a second round of public comment was undertaken and eight submissions received. After incorporating the resolved comments, a final draft was forwarded to all jurisdictions. The final draft was prepared for OBPR for their consideration. On 18 October 2016, OBPR informed ARPANSA that no Decision Regulatory Impact Statement (RIS) was required and that the preparation of the PEC was in compliance with COAG requirements. Members endorsed the PEC subject to agreed minor amendments.

Action 5: References in Schedule A regarding time frames need to be clarified by removing 'calendar' immediately (RSB)

Action 6: Submit endorsed version of PEC to the RH&SAC for approval to publish as *RPS C-1 Planned Exposure Code (2016)* (CEO)

Item 3.4 **Existing Exposure Guide (EEG)**

Dr Hirth

Dr Hirth submitted the revised EEG to the Committee for their consideration and endorsement. It was noted that the preliminary assessment was submitted to the OBPR in August 2016 and ARPANSA subsequently advised that no RIS was required. The one consistent barrier was that a code cannot include requirements that place a responsibility on state and territory governments to undertake regulatory functions as this can only be agreed through the National Directory for Radiation Protection (NDRP). To move forward, it was proposed to change the code to a guide.

The RHC endorsed the release of the EEG for public consultation.

Action 7: RHC Members to provide list of key stakeholders for public consultation (Members)

Action 8: Draft EEG to be published for public consultation with an explanatory note (RT/FC)

Item 3.5 **Emergency Exposure Guide**

Dr Hirth

Dr Hirth presented the Emergency Exposure Guide to the Committee for their consideration. It was noted that the preliminary assessment (for a code) had been submitted to the OBPR in August 2016 and ARPANSA subsequently advised that no RIS was required. Dr Hirth advised that, following consultation with the states and territories, it was noted that a code cannot include requirements that place a responsibility on state and territory governments to undertake regulatory functions as this can only be agreed through the National Directory for Radiation Protection (NDRP). Subsequently the code was redrafted as a guide. It was noted by Dr Hirth that this document still required significant work. Members were requested to provide further comments on the structure of the document to ensure it reflects the needs of the emergency response communities.

Members endorsed the approach to progress this document as a guide and to integrate the current RPS 7, or most of it, into this new guide.

Action 9: RHC Members to provide comments to RA by 16 December 2016 (Members)

Action 10: Develop a mature draft guide for public consultation by next RHC meeting (RHS/FC/RT)

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Mr Critchley updated the Committee on the progress of the IPL Working Group. An analysis of the 241 responses to the Consultation RIS concluded that there was insufficient information to substantiate the cost versus benefit estimations that would be required for a Decision RIS to be developed.

The analysis included an assessment of the perspective of each respondent in relation to the options provided for consideration in the Consultation RIS. The analysis identified a number of important issues expressed by the respondents, including education requirements; grandfathering; potential impacts and concerns in relation to regulation; and equipment/premises requirements. Approximately 38% of all respondents expressed concerns for client safety. Unfortunately, there was no substantive comment made on the cost versus benefit estimations.

There were two perspectives portrayed in the responses to the Consultation RIS that were due to the two main cosmetic service provision groups – the medical group and the non-medical group. Although there were clear differences in the perspectives of the respondents, the vast majority expressed a need for some type of structured education for new entrants into the business.

The Committee agreed not to proceed with a Decision RIS.

The Committee agreed that there is an opportunity to develop a national uniform approach to key issues raised by the consultation process. The development of a guide would provide a common framework for terminology, education, training, equipment, patient care and injury reporting.

The Committee agreed to establish a working group to draft the guide; this will include Mr Critchley, Mr Newbery, Prof Cassels, and Dr Tinker. A letter inviting Mr Rees (Laser Therapy & Natural Medicine Pty Ltd) and Mr Hammond (The Global Beauty Group) to be part of the working group is to be sent.

Action 11: The analysis of the responses to be revised as a standalone technical paper (RT)

Action 12: Working Group to draft guidance document for cosmetic use of lasers and IPLs for RHC comment by next meeting (SC/SN/RT)

Action 13: Letter to interested parties to join the working group (SC/JJ)

Action 14: Prepare and forward a reply to OBPR on feedback received on the consultation (JJ/SC)

Mr Kalaiziovski presented his paper to the Committee via telephone advising that the conditions of authorisation for industrial radiography have been drafted in consultation with the Australian Institute for Non-Destructive Testing (AINDT). Mr Kalaiziovski advised that comments from the Northern Territory were received and incorporated; however, there has been no response from the other state and territory regulators.

The Committee advised that the work undertaken was of considerable value to the jurisdictions. After some deliberation, it was determined that this document should be redrafted into a code to include the mandatory requirements, within a relatively short timeframe.

The Committee agreed to the appointment of Mr Cleaves as sponsor for this project with assistance from Mr Ahmed from Tasmania.

Action 15: Member comments to be forwarded to RA for inclusion in Code to replace RHS31 before end of December (Members/RA)

Action 16: Draft Code to be circulated to RHC members out of session for receiving the Committee’s endorsement of distribution for public consultation (RA/AK)

Action 17: Prepare a preliminary assessment for OBPR (RA/AK)

Item 3.8

Review of RPS3

Dr Tinker

Dr Tinker advised the Committee that ARPANSA is planning a review of the RF Standard (RPS 3) following the publication of the revised ICNIRP Guidelines and the WHO scientific review. The ICNIRP and WHO reviews are not expected to be published until late 2017.

It is proposed that the RPS 3 is published as an ARPANSA code and aligned with ICNIRP Guidelines using a risk-informed, evidence-based approach. A working group will be established with members from government, industry and the community to review how workers and the public are protected. Once drafted the preliminary assessment will be forwarded to OBPR to seek advice on whether a RIS is required.

Dr Hocking provided a document titled ‘Definition of Occupational Exposure’ which was drafted after consideration of Agenda Items 1.4, 3.3, 3.8 and 4.4 and noted the following:

- There needs be a logical and consistent definition of ‘occupational exposure’
- There should be a distinction between ‘public’ and ‘occupational exposure levels’
- RF workers should be aware of their exposure and potential hazards
- RF exposure of pregnant workers should be within public exposure levels

The Committee agreed to the appointment of Dr Hocking as sponsor for this project. The Committee agreed to set up a working group to prepare the protection section.

Action 18: Progress to be reported at next RHC meeting (GH/RT)

4.

GENERAL INFORMATION ITEMS

Item 4.1

International Liaison, publications & other items of interest

Mr Lyon provided an update on the recent Nuclear Safety Committee meeting. Topics covered included: progress of ARPANSA’s self-assessment under the Regulator Performance Framework; the guidelines for licence applications for large-scale waste facilities; and an update on major controlled facilities and sources.

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Item 4.2 Improving the ARPANSA Website**Mr Guilfoyle**

Mr Guilfoyle presented the project to redesign the ARPANSA website with the aim to improve the user experience. The two main areas of focus are the 'Our Services' and 'Regulation and Licensing' pages. A number of workshops with external providers have been completed which identified the requirements for redevelopment of the website. Two links were provided to Members prior to the meeting requesting input with regard to the categorisation of information and the ease of finding information. Mr Guilfoyle thanked the Committee and advised their input would be included in the redesign.

Item 4.3 Mutual Recognition**Mr Kumar**

The Committee was advised that stakeholder feedback received during 2015-2016 through the 'Stakeholder Feedback – National Uniformity Issues' form on the ARPANSA website is being resolved.

Mr Kumar proposed that an RHC project be formed to re-visit the related issues of national uniformity, mutual recognition and the National Directory for Radiation Protection.

The Committee agreed to the appointment of Mr Cleaves as sponsor for this project with Mr Kumar as the Technical Support Officer.

Action 19: Discussion paper to promote Uniformity/Mutual Recognition to be prepared for next RHC Meeting (RA/SK/NC)

Item 4.4 International Protection Framework for Exposure to Non-Ionizing Radiation**Dr Hirth**

The Committee was informed of progress on the development of the Fundamental Safety Principles (FSP) and Basic Safety Requirements (BSR) for Protection against Non-Ionizing Radiation (NIR) by the WHO Steering Committee. This project will provide an opportunity to harmonise NIR protection practices in Australia. Participation on the Steering Committee to develop the BSR provides an opportunity to strongly influence the development of international best practice.

It was recognised that Agenda item 3.8 also relates to this item. Work on review of RPS 3 will provide useful input for the Australian representative on the WHO Steering Committee.

It was noted that the ACTU correspondence (Item 1.4 #6) quoted scientific reviews that stated that NIR was very harmful. ARPANSA does not agree with those studies and will consider a proper response.

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5. CLOSING

Item 5.1 Any Other Business

Chair

Mr Critchley advised the security levels in RPS 11 are different from those terms commonly used. He advised that there needs to be a document to fill the gap and ensure the code remains relevant.

Action 20: Prepare a draft document to ensure relevancy of terms (JS/JM)

Item 5.2 Next Meeting

Chair

The Chair advised the Committee that the date for the next RHC meeting will be confirmed out of session.

Next meeting	To be confirmed out of session
Close	3: 57 pm

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