



26 July 2022

Draft Radiation Protection and Control Regulations 2022 (SA)

The Australian Society of Medical Imaging and Radiation Therapy (ASMIRT) is the peak body representing medical radiation practitioners in Australia. Our aims are to promote, encourage, cultivate and maintain the highest principles of practice and proficiency of medical radiation science, always mindful that the welfare of the patient should be at the centre of everything we do.

Thank you for the opportunity to provide feedback on the document:

Applying for a Radiation Authorisation – The Knowledge Test policy document.

- Section 5.1 of the above document refers to diagnostic radiology. Please change this to read diagnostic radiography.
- ASMIRT suggests that the word “specialist” does not need to be in front of the word radiation Oncologist.
- 5.2 – refers to “Practice of diagnostic radiography” and “Diagnostic radiography in the practice of medicine”. ASMIRT suggests that this is the same and as such, the qualification is the same. i.e., which is registration with Ahpra in the relevant specialty.
- Instead of “in the relevant specialty” ASMIRT suggests changing this to read be “Registered with AHPRA as a medical radiation practitioner, registration type diagnostic radiographer”.
- It is not clear why it reads (except fluoroscopy or tomography) in brackets? ASMIRT queries, whether this should encompass all modalities if it is referring to “...the practice of medicine”?
- “The practice of radiation oncology” qualifications should be “Registered with Ahpra as a medical practitioner in the specialty of radiation oncology”. Registration as a specialist medical oncologist or specialist paediatric medical oncologist needs to be removed as these qualifications do not satisfy the criteria to practice radiation oncology. ASMIRT recommends that clarification is sought from RANZCR.
- “The practice of radiation therapy” qualifications should be “Registered by Ahpra as a medical radiation practitioner, registration type radiation therapist”.
- “Medical physicist – diagnostic medical imaging” ASMIRT suggests changing this to read t “diagnostic radiography” for consistency. The term medical imaging is not referred to anywhere else in the document.

COC – 2 Code of compliance for facility design and shielding 2022

- References radiotherapy throughout the document and this should be changed to “radiation therapy” to be consistent and align with terminology used in the “applying for a radiation authorisation” and COC-5 Code of compliance for Radiation Therapy Apparatus 2022” documents.

COC-1 and Guide to code of compliance for radiation management plans

ASMIRT believes that this section is satisfactory.

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- Page 73 lists specialist radiation oncologist, specialist medical oncologist, and specialist paediatric medical oncologist as health professionals who may authorise radiation therapy. It is recommended that the latter 2 are removed as they do not have the qualifications to authorise this.
- This section does not mention Radiation Protection of the Patient. Diagnostic Reference Levels (DRLs) need to be legislated (and ethical approval should be waived for de-identified data to be shared with the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA)).

Apparatus Code of Compliance

ASMIRT believes that this document can reference the ARPANSA standard.

ASMIRT suggests that the both the RMP and the Graded approach info sheet are vague with minimal details which renders these items non-functional.

ASMIRT is pleased to see the inclusion of 'mutual recognition' to be of great benefit for MRPs who relocate across states.

ASMIRT notes that RPS14 is no longer on the list of Codes but has been replaced with RPSC-5 Code Radiation Protection in Medical Exposure and RPS C-1 Code for Radiation Protection in Planned Exposure Situations.

The item for rural and remote areas appears in line with what is in place already, although ASMIRT has identified that this may be of issue, particularly in relation to what constitutes accredited training (accredited by who) and what are appropriate conditions and restrictions?

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