Submission form for revised C1 2023

### Your details

|  |  |
| --- | --- |
| This submission was completed by: *(name)* |  |
| Address: *(street/box number)* |  |
| *(town/city and postcode)* |  |
| Email: |  |
| Organisation (if applicable): |  |
| Position (if applicable): |  |

### Additional information

I am, or I represent an organisation that is, based in:

|  |  |  |
| --- | --- | --- |
|  | New Zealand | |
|  | Australia | |
|  | Other (please specify): |  |

I am or I represent:

|  |  |  |
| --- | --- | --- |
|  | A health practitioner | |
|  | A servicing engineer | |
|  | A medical radiation technologist | |
|  | A medical physics expert | |
|  | A qualified expert other than a servicing engineer, medical radiation technologist or a medical physics expert | |
|  | A supplier of radiological equipment | |
|  | An organisation involved with diagnostic and interventional radiology, or dental radiology | |
|  | Other (please specify): |  |

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**Please return this form:**

By email to: [ors.codes@health.govt.nz](mailto:ors.codes@health.govt.nz)

By post to: Office of Radiation Safety C1  
Ministry of Health  
PO Box 5013  
Wellington 6140

### Consultation questions

**The Director for Radiation Safety is specifically seeking feedback and comments on the following:**

* + - * 1. Is the title of the revised C1 clear and accurate (eg, should it include dental radiology using cone beam computed tomography)?

|  |  |
| --- | --- |
|  | Yes |
|  | No |

Comments:

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* + - * 1. Is the proposed interpretation of ‘medical physics expert’ appropriate?

|  |  |
| --- | --- |
|  | Yes |
|  | No |

Comments:

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* + - * 1. Is the proposed interpretation of an ‘overexposure of a person’ appropriate and comprehensive?

|  |  |
| --- | --- |
|  | Yes |
|  | No |

Comments:

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* + - * 1. Is the proposed interpretation of ‘user of irradiating apparatus’ appropriate?

|  |  |
| --- | --- |
|  | Yes |
|  | No |

Comments:

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* + - * 1. In the proposed interpretation of ‘referring practitioner’, ‘health professional’ has replaced ‘health practitioner’. Is this an appropriate change?

|  |  |
| --- | --- |
|  | Yes |
|  | No |

Comments:

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* + - * 1. Is the proposed requirement for the holder of a source licence (HSL) to ensure that radiation shielding incorporated in the structure of a place is approved by a medical physics expert or another qualified expert justified to ensure protection and safety?

|  |  |
| --- | --- |
|  | Yes |
|  | No |

Comments:

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* + - * 1. Is the proposed requirement that the HSL must use an accredited provider to supply a dose monitor to be used by an individual who is likely to exceed three tenths of a dose limit justified to ensure protection and safety?

|  |  |
| --- | --- |
|  | Yes |
|  | No |

Comments:

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* + - * 1. Is the proposed requirement that the HSL must retain records that verify compliance and are not patient or occupational health records where other legislation applies for not less than 10 years appropriate?

|  |  |
| --- | --- |
|  | Yes |
|  | No |

Comments:

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* + - * 1. Is it appropriate for clause 25 (‘Referring practitioner’) of the current Code of Practice for Diagnostic and Interventional Radiology ORS C1 to be deleted?

|  |  |
| --- | --- |
|  | Yes |
|  | No |

Comments:

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* + - * 1. Is it appropriate for Appendix 2 of the current Code of Practice for Diagnostic and Interventional Radiology ORS C1 to be deleted?

|  |  |
| --- | --- |
|  | Yes |
|  | No |

Comments:

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* + - * 1. Is it appropriate for baselines, and suspension and remedial levels to be approved by a medical physics expert and for such values to be based on data provided in standards and in guidance produced by professional bodies?

|  |  |
| --- | --- |
|  | Yes |
|  | No |

Comments:

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* + - * 1. Clause 20(a)(ii) of the revised C1 requires that quality control testing is carried out periodically following commissioning. Is it appropriate that such testing should be carried out at least once every year (this is not in the revised C1)?

|  |  |
| --- | --- |
|  | Yes |
|  | No |

Comments:

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* + - * 1. Do the training requirements in Appendix 2 of the revised C1 provide an adequate core of knowledge for those who have roles for protection and safety that are specified by the HSL?

|  |  |
| --- | --- |
|  | Yes |
|  | No |

Comments:

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* + - * 1. Are the training requirements in Appendix 2 of the revised C1 appropriate and comprehensive for the training of a radiation safety officer?

|  |  |
| --- | --- |
|  | Yes |
|  | No |

Comments:

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* + - * 1. Are there changes you think are necessary to the obligations of the HSL in the revised C1?

|  |  |
| --- | --- |
|  | Yes |
|  | No |

Comments:

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* + - * 1. Are there changes you think are necessary to the obligations of other parties in the revised C1?

|  |  |
| --- | --- |
|  | Yes |
|  | No |

Comments:

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* + - * 1. Are there any other changes you would like to suggest to the revised C1 or comments that you would like to make?

|  |  |
| --- | --- |
|  | Yes |
|  | No |

Comments:

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