Submission form for revised C2 2024

### 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 nuclear medicine |
|[ ]  other (please specify): |  |

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If you do not want your submission published on the Ministry’s website, please tick this box:

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**Please return this form:**

By email to: ors.codes@health.govt.nz

By post to: Office of Radiation Safety C2
Ministry of Health
PO Box 5013
Wellington 6140

### Consultation questions

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

1. Is restricting the scope of the revised C2 to unsealed radioactive material appropriate?

|  |
| --- |
|[ ]  Yes |
|[ ]  No |

Comments:

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2. Is describing nuclear medicine as ‘the use of unsealed radionuclides in medicine for diagnosis, staging of disease, therapy and monitoring the response of a disease process. This includes but is not limited to the use of unsealed radioactive material in imaging, in vivo diagnostics, and as tracers’ accurate?

|  |
| --- |
|[ ]  Yes |
|[ ]  No |

Comments:

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3. Is the proposed interpretation of ‘medical physics expert’ appropriate?

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| --- |
|[ ]  Yes |
|[ ]  No |

Comments:

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4. Is the proposed interpretation of an ‘overexposure of a person’ appropriate and complete?

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| --- |
|[ ]  Yes |
|[ ]  No |

Comments:

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5. Is interpretation of ‘radioactive waste’ appropriate?

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| --- |
|[ ]  Yes |
|[ ]  No |

Comments:

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

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| --- |
|[ ]  Yes |
|[ ]  No |

Comments:

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7. Is the proposed interpretation of an ‘underexposure of a person’ appropriate and complete, and is the requirement to notify the Director appropriate?

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| --- |
|[ ]  Yes |
|[ ]  No |

Comments:

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8. Is the proposed interpretation of a ‘user of unsealed radioactive material’ appropriate and comprehensive?

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| --- |
|[ ]  Yes |
|[ ]  No |

Comments:

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9. Is the replacement of the requirement in clause 5(c)(ii) for an ‘emergency shower’ by a requirement for ‘where appropriate, a shower for the decontamination of a person contaminated with radioactive material’ appropriate?

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| --- |
|[ ]  Yes |
|[ ]  No |

Comments:

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10. Is the requirement in clause 5(e) for radiation shielding to be approved by a medical physics expert or another qualified expert appropriate?

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| --- |
|[ ]  Yes |
|[ ]  No |

Comments:

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11. Are the requirements in clause 6(j) and 6(k) of the revised C2 for the disposal of radioactive waste, such as potentially limits being added to source licences, appropriate and adequate?

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| --- | --- |
| ☐ | Yes |
| ☐ | No |

Comments:

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12. ‘3 Bq/cm2‘ is referenced in clause 10(f) of the current C2. Is the removal of the reference from clause 11(f) of revised C2 appropriate?

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|[ ]  Yes |
|[ ]  No |

Comments:

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13. Is the proposed requirement in clause 12(b) of the revised C2 that the holder of a source licence must use an accredited provider to provide 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?

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| --- |
|[ ]  Yes |
|[ ]  No |

Comments:

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14. 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 the values provided in standards and in guidance produced by professional bodies?

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| --- |
|[ ]  Yes |
|[ ]  No |

Comments:

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15. In clause 21 of the revised C2, is the title ‘Discharge of a patient who has undergone therapy’ appropriate and are the requirements, including use of the description ‘not discharged to be an outpatient’, adequate and appropriate?

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| --- |
|[ ]  Yes |
|[ ]  No |

Comments:

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16. Is it appropriate to delete clause 24 (‘Referring practitioner’) of the current C2?

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| --- |
|[ ]  Yes |
|[ ]  No |

Comments:

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17. Would the inclusion in a revised C2 of a completed ‘Appendix 1: Cross-reference to Radiation Safety Act 2016’ be useful?

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|[ ]  Yes |
|[ ]  No |

Comments:

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18. Is it appropriate to replace ‘Appendix 2: Training requirements’ (as in the current C2) with ‘Appendix 2: Training requirements for radiation safety officers’?

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|[ ]  Yes |
|[ ]  No |

Comments:

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19. Are the training requirements in Appendix 2 of the revised C2 appropriate and comprehensive for training a radiation safety officer?

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|[ ]  Yes |
|[ ]  No |

Comments:

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20. Do the training requirements in Appendix 2 of the revised C2 provide an adequate core of knowledge for those who have roles for protection and safety that are specified by the holder of a source licence?

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| --- |
|[ ]  Yes |
|[ ]  No |

Comments:

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21. Are there any other changes you would like to suggest to the revised C2 or comments that you would like to make?

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| --- |
|[ ]  Yes |
|[ ]  No |

Comments:

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