MINISTRY OF HEALTH
MANATŪ HAUORA

New Zealand Government

Code of Practice for Non-medical Uses of Ionising Radiation

Draft for consultation

Released 2017 **health.govt.nz**

Citation: Ministry of Health. 2017. *Code of Practice for Non-medical Uses of Ionising Radiation*. Wellington: Ministry of Health.

Published in December 2017
by the Ministry of Health
PO Box 5013, Wellington 6140, New Zealand

ISBN 978-1-98-850284-7 (online)
HP 6676

This document is available at health.govt.nz

Contents

Introduction

Purpose and commencement

This Code of Practice for Non-medical Uses of Ionising Radiation (this code) will be issued by the Director for Radiation Safety (the Director) under section 86 of the Radiation Safety Act 2016 (the Act), when the Code comes into force. This code provides details necessary to comply with the fundamental requirements in sections 9–12 of the Act. It does not limit the general nature of those requirements. Appendix 1 cross-references those fundamental requirements with clauses in this code.

Scope

This code applies to all facilities and activities relating to protection and safety in non-medical uses of ionising radiation, including all related occupational and public exposures. Activities include:

- producing, supplying and providing radioactive material and devices that contain radioactive material, and consumer products
- producing and supplying devices that generate radiation, including linear accelerators, cyclotrons and fixed and mobile radiography equipment
- using radiation or radioactive material for industrial, veterinary, agricultural, legal or security purposes, which includes using associated equipment, software or devices where such use could affect exposure to radiation
- using radiation or radioactive material for education, training or research, including any activities relating to such use that involve or could involve exposure to radiation or exposure due to radioactive material
- mining and processing of raw materials that involve exposure due to radioactive material.

The following are excluded from the scope of this code:

- protection and safety in medical uses of ionising radiation (dealt with in *ORS C1: Code of Practice for Medical Uses of Ionising Radiation*)
- security of radiation sources in use and storage (dealt with in *ORS C3: Code of Practice for Security of Radiation Sources*)
- safety and security of radiation sources in transport (dealt with in *ORS C4: Code of Practice for Transport of Radiation Sources*).

Complying with this code does not necessarily mean you have complied in related areas such as health practitioner clinical competence, occupational safety, hazards in the workplace and resource management.

Contact

The Director's contact details are:

Office of Radiation Safety
PO Box 3877
Christchurch 8140

Phone: 03 974 2358
Email: orsenquiries@moh.govt.nz
www.health.govt.nz/our-work/radiation-safety

Roles and responsibilities

The following individuals and bodies have roles and responsibilities in relation to this code. The next section defines the other words given in bold.

Managing entity – the legal entity that manages or controls **radiation sources** and so must get a source licence as section 13(a) of the Act states. A managing entity could be, for example, a company, partnership, trust or individual person.

Qualified expert – an individual who is recognised as having expertise in a relevant field of specialisation such as radiation safety.

Radiation safety officer – a person who is competent in radiation protection and safety who the managing entity appoints to oversee the application of regulatory requirements.

Servicing engineer – a person who has expertise in installing, servicing and maintaining **radiation equipment**.

Standards dosimetry laboratory – a laboratory that is certified or accredited to develop, maintain or improve primary or secondary standards for radiation dosimetry.

Supplier – the person or organisation that designs, manufactures, produces, constructs, assembles, installs, distributes, sells, exports or imports **radiation sources.**

Definitions

The **bold** defined terms on the left have the following meanings. Other **bold** terms indicate defined terms that this list also covers.

Accident – any unintended event, including operating errors, equipment failures and other mishaps, for which the consequences or potential consequences for **protection and safety** are not negligible.

Ancillary equipment – equipment other than **radiation equipment** that has an impact on the successful outcome of a **radiation procedure**, such as automatic film processors, printers, image receptors, view boxes and equipment used for digital image display.

Clearance level – the level of activity and activity concentration for radioactive material set out in Schedule 2 of the Act.

Constraint – a prospective and source-related value of individual dose (dose constraint) or of individual risk (risk constraint) that is used in **planned exposure situations** as a parameter for **optimising protection and safety** for the source, and that serves as a boundary in defining the range of options in **optimisation**. The Director establishes or approves these constraints and then publishes them in compliance guides issued under this code.

Consumer product – a device or manufactured item into which radionuclides have deliberately been incorporated or produced by activation, or that generates ionising radiation and that can be sold or made available to members of the public without special surveillance or regulatory control after sale.

Controlled area – a defined area in which specific measures for **protection and safety** are or could be required for controlling exposures or preventing the spread of contamination in normal working conditions, and preventing or limiting the likelihood and magnitude of **potential exposures**.

Dose limit – the value of **effective dose** or **equivalent dose** set out in Schedule 3 of the Act.

Effective dose – the tissue-weighted sum of **equivalent doses** in all specified tissues and organs of the body.

Emergency – any non-routine situation that makes prompt action essential, primarily to reduce actual or perceived hazards or harmful consequences for human health and safety, quality of life, property or the environment. Emergencies include **radiation emergencies** and conventional emergencies such as fires, release of hazardous chemicals, storms and earthquakes.

Employer – the legal entity that employs **workers**. A self-employed person is seen as both an employer and a **worker**.

Equivalent dose – the radiation-weighted dose in a tissue or organ of the body.

Facility – the location where **radiation equipment** and **ancillary equipment** are installed, used, handled or stored.

Incident – any **accident** or other unintended event, including initiating events, accident precursors, near misses or other mishaps, or unauthorised acts, malicious or non-malicious, for which the consequences or potential consequences are not negligible for **protection and safety**.

Individual monitoring – **monitoring** using measurements by equipment worn by individuals, or measurements of monitoring quantities of **radioactive material** in or on, or taken into, the bodies of individuals, or monitoring quantities of **radioactive material** that individuals excrete from the body.

Investigation level – value of a quantity such as effective dose, intake or contamination per unit area or volume at or above which an investigation would be conducted.

Irradiating apparatus – electrical equipment that generates ionising radiation as set out in section 5 of the Act.

Justify – establish that the expected benefits to individuals and to society from introducing or continuing a practice outweigh the harm (including the radiation detriment) resulting from the practice. 'Justifies', 'justified', 'justifying' and 'justification' have corresponding meanings.

Medical exposure – exposure to ionising radiation of: patients for medical or dental diagnosis or treatment; comforters/carers while caring for, supporting or comforting patients going through radiation procedures; and volunteers in a programme of medical research.

Member of the public – for purposes of **protection and safety**, any individual in the population except for individuals who experience **occupational exposure** or **medical exposure**.

Monitoring – measuring dose, dose rate or activity so that it is possible to assess or control exposure due to radiation or **radioactive material**, and to interpret the results.

Occupational exposure – exposure of **workers** to ionising radiation through the work they do.

Operational limits and conditions – limits and conditions that the Director establishes or approves and that, if established, are published in compliance guides issued under this code.

Optimise – implement a level of **protection and safety** that keeps the size of individual doses, the number of individuals (**workers** and **members of the public**) who experience exposure and the likelihood of exposure as low as reasonably achievable, taking account of economic and social factors. 'Optimises', 'optimised', 'optimising' and 'optimisation' have corresponding meanings.

Planned exposure situation – situation of exposure that arises from the planned operation of a **radiation source** or from a planned activity that results in an exposure due to a **radiation source.**

Potential exposure – possible future exposure that may result from an anticipated operational occurrence or **accident** at a source or from an event or sequence of events that can potentially occur, including equipment faults and operating errors.

Protection and safety – the protection of people against exposure to ionising radiation or exposure due to **radioactive material** and the safety of **radiation sources**, including the means for achieving this, and the means for preventing **accidents** and for reducing the consequences of **accidents** if they do occur.

Public exposure – exposure to ionising radiation that a **member of the public** experiences, but excluding any **occupational exposure** or **medical exposure**.

Radiation emergency – an **emergency** in which a hazard due to radiation exposure occurs or is perceived to occur.

Radiation equipment – equipment and its associated software used to perform **radiation procedures** that either deliver an exposure of an individual or directly control or influence the extent of such exposure.

Radiation procedure – a procedure involving the use of a **radiation source** except for procedures associated with delivering **medical exposures**.

Radiation source – anything that may cause radiation exposure, such as by emitting ionising radiation or by releasing radioactive substances or **radioactive material** that can be treated as a single entity for the purposes of **protection and safety**.

Radioactive material – material that spontaneously emits ionising radiation.

Radioactive source – a **radiation source** that spontaneously emits ionising radiation.

Radioactive waste – radioactive material of no further use that contains, or is contaminated with, radionuclides at activity concentrations higher than **clearance levels**.

Reportable incident – an **incident** that involves: (a) exceeding a **dose limit**; (b) losing a **radiation source**, or a **radiation source** that is missing or beyond regulatory control; or (c) administering a radiation dose that is substantially higher than intended.

Safety assessment – assessment of all aspects of a practice that are relevant to decide whether provisions for **protection and safety** are adequate.

Source categorisation – categorisation for **radioactive material** in line with Schedule II of the International Atomic Energy Agency's publication *Radiation Protection and Safety of Radiation Sources: International Basic Safety Standards GSR Part 3*.

Supervised area – an area other than a **controlled area** for which occupational exposure conditions need to be kept under review, even though it does not normally need specific measures for **protection and safety**.

Worker – an individual who works, full time, part time or temporarily, for the managing entity or another **employer** and who has recognised rights and duties in relation to occupational radiation protection. A self-employed person is seen as both an **employer** and a worker.

Workplace monitoring – **monitoring** carried out in the working environment.

Managing entity

General

1. The managing entity must:
   (a) take overall responsibility for protection and safety, which it cannot delegate
   (b) apply measures for protection and safety in a graded manner that is:
      (i) appropriate for the radiation risks in the exposure situation
      (ii) adequate to ensure compliance with this code
   (c) ensure that:
      (i) no practice is undertaken unless it is justified
      (ii) protection and safety are optimised and documented
      (iii) occupational and public dose limits are not exceeded
   (d) assess the likelihood and scale of potential exposures, their likely consequences and the number of individuals who they may affect
   (e) conduct, document and keep up to date a safety assessment in any case where an exposure greater than 30 percent of a dose limit is possible
   (f) conduct, document and keep up to date a radiation environmental impact assessment if radioactive material:
      (i) is expected to be released to the environment in normal operations, or
      (ii) could be released to the environment in an accident
   (g) establish a management system to enhance protection and safety by:
      (i) effectively integrating protection and safety into the overall management system of the organisation
      (ii) making a commitment to protection and safety and providing all required resources
      (iii) promoting continuous improvement and a safety culture
   (h) ensure infrastructural arrangements are in place for the interfaces between safety and security of radioactive sources.

2. As part of meeting its responsibility in clause 1(a), the managing entity must:
   (a) as necessary, consult with and engage the services of qualified experts, workers and other interested parties
   (b) delegate:
      (i) the installing and servicing of radiation equipment, including compliance with clause 20, to a servicing engineer
      (ii) other functions as appropriate , which may be to a radiation safety officer or someone else

(c) cooperate as necessary with employers in any case where workers are not employed by the managing entity

(d) for all delegations under clauses 2(b):

(i) ensure that delegates are notified of their duties in relation to protection and safety and that they take responsibility for performing them

(ii) fully document the delegations.

Restricted activities

3. The managing entity must not, without the prior written approval of the Director, allow:

(a) practices, except for justified practices involving medical exposure, that result in an increase in activity by deliberately adding radioactive material or by activation, in food, feed, beverages, cosmetics or any other commodity or product intended for a person to ingest, inhale or take in through the skin, or to be applied to them

(b) practices involving the frivolous use of radiation or radioactive material in commodities or in consumer products such as toys and personal jewellery or adornments, which result in an increase in activity by deliberately adding radioactive material or by activation

(c) human imaging using radiation that is:

(i) performed as a form of art or for publicity purposes

(ii) performed for occupational, legal or health insurance purposes, and is undertaken without referring to clinical indication

(iii) used to detect concealed objects

(d) devices or manufactured items into which radionuclides have deliberately been incorporated or produced by activation, or that generate ionising radiation and that can be sold or made available to members of the public without special surveillance or regulatory control after sale to be made available to the public.

Facilities

4. The managing entity must:

(a) provide facilities that are:

(i) sited, located, designed, manufactured, constructed, assembled, commissioned, operated, maintained and decommissioned with good engineering practice, minimising the need to rely on administrative controls and personal protective equipment for protection and safety

(ii) shielded sufficiently to optimise protection and safety

(b) designate and delineate appropriate areas as controlled areas or supervised areas and periodically review those decisions

(c) prominently display signs:

(i) specifying the actual or potential presence of ionising radiation, using the symbol that the International Organization for Standardization recommends, at access points to controlled areas and supervised areas and at appropriate locations within controlled areas

(ii) controlling access by members of the public to controlled areas and supervised areas.

Radiation sources and equipment

5. The managing entity must:

(a) provide, maintain, test and service radiation sources as necessary so that they:

(i) are appropriate for the radiation procedures to be performed

(ii) remain capable of meeting their design requirements for protection and safety throughout their lifetime

(b) cooperate with suppliers to:

(i) ensure that the suppliers comply with clause 18

(ii) ensure that radiation equipment is used only if it conforms to the applicable standards of the International Electrotechnical Commission and the International Organization for Standardization

(iii) share information on use and operating experience that may be important for protection and safety

(iv) apply the principles of optimisation in designing, planning, operating and decommissioning a source

(v) ensure, where practicable, that sealed sources are identifiable and traceable

(c) safely manage all radiation sources whether or not they are in use

(d) keep an accurate inventory of all radiation sources, including their:

(i) location and description

(ii) activity and form if they are radioactive sources

(iii) source categorisation if they are sealed sources

(e) keep a record of maintenance for each item, including a fault log and remedial actions taken (interim and subsequent repairs), the results of testing before an item is reintroduced to clinical use, and any reports from servicing engineers

(f) maintain control of radiation sources to prevent loss or damage and to prevent any person from carrying out unauthorised activities, including by:

(i) periodically checking that the radiation sources are under control and in the locations recorded in the inventory maintained under clause 5(e)

(ii) releasing them only to people who are authorised to assume management and control under the Act

(g) take immediate steps to regain control of any radiation sources that are abandoned, lost, misplaced, stolen or otherwise transferred without proper authorisation.

6. The managing entity must ensure that:

   (a) calibrations of all dosimeters used for the calibration of sources are traceable to a standards dosimetry laboratory and performed by a calibration service that the Director has approved

   (b) safely manage and dispose of radioactive waste, including by:

      (i) keeping the activity and volume of waste generated to the minimum practicable

      (ii) separately processing radioactive waste of different types

      (iii) ensuring effective predisposal management and disposal of radioactive waste

      (iv) keeping an inventory of all radioactive waste that is generated, stored, transferred or disposed of

      (v) developing and implementing a strategy for radioactive waste management, including gathering appropriate evidence that shows protection and safety are optimised.

7. The managing entity must provide, maintain, test, calibrate and service equipment other than radiation equipment to a level that is sufficient to ensure it complies with this code. This equipment includes equipment for personal protection, monitoring and measurement for compliance verification, accident verification, emergency response, and protection and safety of members of the public.

Training and authorisation

8. The managing entity must ensure that:

   (a) all people with responsibilities for protection and safety are:

      (i) appropriately qualified, educated and trained in protection and safety so that they understand their duties and can perform them competently

      (ii) named in a current list with details of their specialisation, qualification, education and training

      (iii) authorised to assume their roles and responsibilities

   (b) any external education or training service has been approved by the Director.

Policies, procedures and local rules

9. The managing entity must establish, implement and maintain policies and procedures to comply with this code. These include, without limitation, policies and procedures to:

   (a) control access to areas where people can be exposed to radiation

   (b) use constraints in optimising protection and safety

   (c) control the discharge of radioactive material and restrict exposure due to contamination

   (d) prevent accidents wherever possible and reduce the consequences of those accidents that do occur

   (e) comply with operational limits and conditions relating to public exposure

(f) provide for protection and safety by applying preventive measures in the priority order of:

(i) engineered controls

(ii) administrative controls

(iii) personal protective equipment

(g) set investigation levels and establish procedures to follow if such levels are exceeded

(h) implement procedures for verification.

10. The managing entity must maintain, publish and enforce written local rules that are necessary for protection and safety.

Monitoring and measurement

11. The managing entity must establish and maintain:

(a) a programme of continuous individual monitoring, whenever this is appropriate, adequate and feasible, that is sufficient to assess occupational exposures for workers who usually work in a controlled area or who may receive a dose above 30 percent of the dose limits

(b) a programme of workplace monitoring, under the supervision of a radiation safety officer or qualified expert, that is sufficient to:

(i) evaluate radiation conditions in all workplaces

(ii) assess exposures in controlled areas and supervised areas that are not assessed under clause 11(a)

(iii) review the classification of controlled areas and supervised areas

(c) a monitoring programme for all workers who could be subject to exposure due to contamination that is sufficient to:

(i) demonstrate the effectiveness of the measures for protection and safety

(ii) assess intakes of radionuclides and committed effective doses

(d) programmes of source monitoring or environmental monitoring that are sufficient to assess public exposure and radioactivity in the environment coming from radiation sources for which the managing entity is responsible

(e) a capability that is sufficient to monitor unexpected increases in radiation levels or concentrations of radionuclides in the environment due to an incident attributed to a source or facility for which the managing entity is responsible

(f) such other monitoring or measurement programmes that are necessary to verify compliance with this code.

12. To satisfy the monitoring and measurement requirements in clause 11, the managing entity must:

(a) get approval from the Director for the monitoring or measurement programme

(b) use appropriate monitoring equipment

(c) for continuous individual monitoring under clause 11(a), use an external service or internal capability only if that service or capability:

(i) is approved by the Director

(ii) returns results of monitoring to the managing entity within 20 working days of receiving all necessary raw information.

13. The managing entity must:

(a) get all previous dose records in relation to workers

(b) keep records of all monitoring and verification of compliance, including records of:

(i) occupational exposure during and after the worker's working life, at least until the former worker reaches or would have reached the age of 75 years, and for no less than 30 years after the worker has stopped the work in which they experienced occupational exposure

(ii) estimated doses to members of the public

(iii) the tests and calibrations carried out

(c) provide records of occupational exposure to:

(i) individual workers about their own exposure

(ii) subsequent employers of workers provided this meets confidentiality criteria

(iii) the Director on request or if the managing entity can no longer keep records as required under clause 13(b)

(d) provide records of source monitoring and environmental monitoring to assess public exposure and radioactivity in the environment to:

(i) members of the public on request

(ii) the Director on request

(iii) the Director immediately any time that levels exceed operational limits and conditions, or when there is any significant increase in dose rate or concentration of radionuclides in the environment that the authorised practice could be responsible for.

Incidents, accidents and emergencies

14. The managing entity must:

(a) take all practicable steps to minimise the likelihood of accidents including, in keeping with the likelihood and magnitude of potential exposures, a multilevel system of sequential, independent provisions for protection and safety

(b) take timely action to reduce the consequences of any accident that does occur and restore radiation sources to a safe condition

(c) promptly investigate any incident, including by:

(i) calculating or estimating doses a person has received and, if applicable, the dose distribution within them

(ii) identifying corrective actions required to prevent such an incident from recurring

(d) implement all corrective actions identified in clause 14(c)(ii)

(e) keep a written record of the incident, including the:

(i) cause or suspected cause

(ii) calculations made under clause 14(c)(i)

(iii) corrective actions identified under clause 14(c)(ii)

(iv) details of the implementation of corrective actions under clause 14(d)

(f) promptly notify the Director of any reportable incident.

15. If the safety assessment required by clause 1(e) indicates that an emergency affecting either workers or members of the public is reasonably likely, the managing entity must prepare an emergency plan to protect people and the environment. This plan must include:

(a) arrangements for promptly identifying an emergency

(b) guidance to identify the correct level of emergency response

(c) arrangements for individual monitoring and area monitoring and for medical treatment

(d) arrangements for assessing and reducing any consequences of an emergency.

Records

16. The managing entity must keep, and make available as necessary, adequate records of:

(a) delegation of responsibilities of the managing entity

(b) training

(c) results of calibrations and periodic checks

(d) the quality assurance programme

(e) exemptions from this code granted under section 86(3) of the Act.

Quality assurance

17. The managing entity must establish a comprehensive programme of quality assurance.

Other parties

Supplier

18. The supplier of radiation sources must:

    (a) supply well-designed, well-manufactured and well-constructed radiation sources that:

        (i) provide for protection and safety in line with this code

        (ii) meet engineering, performance and functional specifications

        (iii) meet quality standards appropriate to the significance of systems and components, including software, for protection and safety

        (iv) provide clear displays, gauges and instructions on operating consoles

    (b) test radiation sources to demonstrate that they comply with all relevant specifications

    (c) provide information on how to properly install and use radiation sources and on associated radiation risks, including performance specifications, instructions for operating and maintenance, and instructions for protection and safety

    (d) optimise the protection that shielding and other protective devices provide

    (e) supply all radiation equipment with all appropriate radiation protection tools as a default, rather than as optional extras

    (f) ensure, where practicable, that radioactive sources or devices that contain radioactive sources are marked with the symbol that the International Organization for Standardization recommends

    (g) cooperate with managing entities to ensure, where practicable, that sealed sources are identifiable and traceable.

19. The supplier must:

    (a) make suitable arrangements with managing entities to share information on use and operating experience that may be important for protection and safety

    (b) cooperate with the managing entity as required by clause 5(b).

Servicing engineer

20. The servicing engineer must:

    (a) install and service radiation equipment competently so that it complies with clause 5

    (b) cooperate with the managing entity to ensure that radiation equipment cannot be used operationally while it is being installed or serviced

(c) after installing or servicing the equipment:

(i) collaborate with the managing entity to ensure necessary quality control tests are completed successfully

(ii) within 24 hours, provide a written report to the managing entity describing the equipment fault (if any), the work done, parts replaced, adjustments made and any changes that may affect protection and safety.

Appendix 1: Cross-references to Radiation Safety Act 2016

As required by section 87(1) of the Radiation Safety Act 2016, clauses in this code apply to the fundamental requirements in sections 9–12 of the Act as follows.

Section in Act	Clauses in this code
9(1)	
9(2)	
9(3)	
10(1)	*To be completed*
10(2)	*following consultation*
10(3)	
11	
12	

Consultation submission

Your details

This submission was completed by: *(name)* _____

Address: *(street/box number)* _____

(town/city) _____

Email: _____

Organisation *(if applicable)*: _____

Position *(if applicable)*: _____

Privacy

We may publish submissions on the Ministry's website. If you are submitting as an individual, we will automatically remove your personal details and any identifiable information.

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

☐ Do not publish this submission.

Your submission will be subject to requests made under the Official Information Act. If you want your personal details removed from your submission, please tick this box:

☐ Remove my personal details from responses to Official Information Act requests.

Please return this form to:

Email: mailto:orsenquiries@moh.govt.nz (including 'non-medical code' in the subject line)

or post: Office of Radiation Safety, PO Box 3877, Christchurch 8140

Consultation questions

The Office of Radiation Safety is seeking comments on the following.

Scope

1. The scope of the code relates to all uses of radiation sources that are not related to the delivery of medical exposures. The intention is that this will be supported by detailed compliance guides for each area of practice (e.g. radiotherapy, use of nuclear density meters). Do you agree that a single code supported by a more detailed individual compliance guides is appropriate?

   ☐ Yes

   ☐ No

   If no, please provide alternative suggestions for the scope of this code.

Roles and responsibilities

2. Are the roles and responsibilities of key parties adequately described?

   ☐ Yes

   ☐ No

   If no, please provide details of parties that should/should not be included and any changes that should be made to the descriptions.

Definitions

3. Are the definitions appropriate and comprehensive?

   ☐ Yes

   ☐ No

   If no, please provide suggestions for any new terms to be defined or changes to existing definitions.

Managing entity obligations

4. a. Are the subheadings within the 'Managing entity' section appropriate?

      ☐ Yes

      ☐ No

   b. Are there other changes you think are necessary to the obligations of the managing entity?

      ☐ Yes

      ☐ No

   Please provide any comments below.

Other parties

5. a. Are there other parties who should have defined responsibilities?

- ☐ Yes
- ☐ No

b. Are there other changes you think are necessary to the obligations of other parties?

- ☐ Yes
- ☐ No

Please provide any comments below.

Additional comments

6 a. Was the information in this code appropriately presented?

- ☐ Yes
- ☐ No

b. Was the information in this code easy to find?

- ☐ Yes
- ☐ No

c. Are there any changes you would like to suggest?

- ☐ Yes
- ☐ No

d. Are there circumstances that are not included in this code but should be? If yes, please provide more details in the comments box below.

- ☐ Yes
- ☐ No

e. Is the information easily understood?

- ☐ Yes
- ☐ No

f. Is there any other information or subject that should be included in this code?

- ☐ Yes
- ☐ No

Please provide any comments related to your answers to 6(a)–(f) below.