



5 July 2017

Department of Health & Human Services
Attention: Radiation Team
By email: radiation.safety@dhhs.vic.gov.au

Proposed Radiation Regulations & legislative instruments – response from the Australian Dental Association Victorian Branch

The Australian Dental Association Victorian Branch is the peak membership body for dentists in Victoria. We are committed to the oral health of all Victorians and the professional lives of our members. We thank the Department for providing this opportunity to comment on the proposed Radiation Regulations and legislative instruments - we will confine our comments to only those proposed legislative changes, which would impact dental practices and dentists.

Radiation Regulations - changes to existing fees

The ADAVB recognises that the Department has taken a balanced approach to developing a new fee structure for radiation management licences. Elimination of the fee associated with applying for a variation to an existing licence or approval, and of the fee associated with applying to transfer an existing management licence is welcome.

ADAVB supports the Department's view that the administration of applications for management licences for dental 3D volumetric X-ray units requires a higher level of risk management, as this involves the use of a higher level of radiation than intra-oral X-ray units, and this would involve additional costs to the Department. The proposal to create a new fee category for dental 3D volumetric X-ray unit management licences, which is higher than that of intra oral X-ray units, is therefore accepted.

Review of the appropriateness of the current licensing approach for dental intra-oral X-ray units

ADAVB notes that, although not part of the consultation on the proposed changes to Radiation Regulations & legislative instruments, the Department is considering "whether an existing licensing exemption power contained in the Act ought to be used to exempt users and those conducting the radiation practice from the requirement to hold a management licence or a use licence subject to conditions being met"¹.

The ADAVB has previously discussed this with the Department, and we support the option of removing the requirement to hold a radiation use licence for intra-oral X ray units for registered dental practitioners and dental assistants, who hold a Certificate IV in Dental Assisting (Dental Radiography). The proposal to eliminate intra-oral X-ray unit management licences would reduce the regulatory burden on dental practices, however, in the interests of public safety, ADAVB urges the Department to further consider how to ensure that intra-oral X-ray units would be appropriately acquired and disposed of in the absence of a management licence. We would welcome the opportunity to further discuss these matters with the Department as this review progresses.

Sincerely,

A handwritten signature in blue ink that reads 'Matt Hopcraft'.

Clinical A/Prof Matt Hopcraft
Chief Executive Officer

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¹ Victorian State Government, Department of Health and Human Services (2017). Review of the Radiation Regulations 2007, Regulatory Impact Statement.

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