



Radiation Regulations 2017 Sunset Review

Victorian Department of Health

Submission of the
Australian Veterinary Association Ltd

May 2026

About the Australian Veterinary Association (AVA)

The AVA is the peak professional body representing veterinary professionals and students across Australia. For more than 100 years we have been the united voice of the veterinary profession.

Veterinarians are among Australia's most trusted and respected professionals, dedicated to safeguarding animal health and welfare and supporting the communities they live in.

Our vision and purpose

Vision *A thriving veterinary profession*

Purpose *Building a vibrant future for veterinary professionals.*

At the AVA we champion the veterinary community, advance professional excellence, foster connectivity, and deliver exceptional member experiences to achieve our vision of a thriving profession.

Essential role of the veterinary profession

Veterinary services are essential to Australia's animal health, food security, and economy. They help secure Australia's animal health and livestock supply chain, protecting hundreds of thousands of jobs and easing cost of living pressures through a safe and reliable food supply.

Beyond agriculture, veterinarians support companion animals and their owners, strengthening the human-animal bond and promoting the associated mental and physical health benefits of pet ownership. Animals are not just a part of the Australian way of life; they are deeply embedded in it - socially, culturally, environmentally, and economically, and veterinarians are an essential part of every vibrant Australian community.

Veterinarians play a pivotal role in maintaining the social licence of animal industries, ensuring animal health and welfare meets community expectations. Like human healthcare and education, veterinary services provide both private benefits to individuals and critical public benefits to society, in areas like biosecurity surveillance, wildlife treatment and health and emergency animal disease management.

Recognised among Australia's most ethical and trusted professionals, veterinarians are highly respected and trusted members of their communities. The Governance Institute of Australia's 2025 Ethics Index ranked veterinarians among the nation's top 5 ethical occupations¹.

¹ [Governance Institute 2025](#)



Introduction

The Australian Veterinary Association (AVA) welcomes the opportunity to provide input to the Victorian Department of Health's sunset review of the *Radiation Regulations 2017*.

In reviewing the consultation materials, the AVA has identified one proposal of particular relevance to the veterinary sector—**Section 2.4: Introduction of an Approval Framework for Personal Radiation Monitoring Service Providers**—and has focused its submission on this item.

The AVA supports the introduction of this approval framework as a positive step toward enhancing worker protection and aligning with national standards.

To maximise effectiveness, the framework should be implemented in a way that is risk-based, proportionate and adaptable, ensuring it supports safe practice without imposing unnecessary burden on veterinary professionals, particularly those operating in small or ambulatory settings.

Discussion

2.4 Introduce an Approval framework for Personal Radiation Monitoring Service Providers (from “Discussion Paper for targeted consultation” provided by Department of Health 30/4/26)

This section examines whether Victoria could introduce an approval framework for personal radiation monitoring service providers, and invites stakeholder input on the benefits, risks and practicalities of implementing such a framework.

Personal radiation monitoring is essential to ensuring that workers who use, handle or may be exposed to ionising radiation remain protected from avoidable harm. Monitoring service providers supply, process and analyse personal dosimeters to measure occupational exposure, enabling duty holders to comply with requirements in the Act and national guidance.

- 1. The Radiation Protection Series S3: Requirements for Personal Radiation Monitoring Services (ARPANSA RPS S3) sets nationally consistent performance, quality assurance and recordkeeping standards for monitoring services. While several Australian jurisdictions approve or regulate monitoring service providers, Victoria currently does not. Providers are not required to obtain approval, nor are they required to notify the department of abnormal, unexpected or high-dose readings.*
- 2. This regulatory gap limits the Health Regulator's visibility of emerging statewide risks, constrains system-level oversight of occupational exposure trends and creates variability in service quality. Stakeholders have advised that, while some service providers voluntarily notify the department of high-dose results, this is not universal and may not be timely or consistent.*
- 3. High dose reports are a great source of information regarding the potential for staff exceeding dose limits, evidence of practices not optimising doses and/or staff being involved in radiation incidents. Currently, two of the three major Personal Radiation Monitoring Service (PRMS) providers appear to voluntarily report high dose reports to the department.*
- 4. A Victorian approval framework could require service providers operating in Victoria to be formally approved by the Health Regulator before supplying personal radiation monitoring services. Considerations for an approval framework can be found at **Appendix 1**.*



5. *Introducing an approval framework may:*

- *strengthen worker protection through improved accuracy, consistency and reliability of dose assessments*
- *enhance regulatory visibility by ensuring mandatory reporting of abnormal doses and data anomalies*
- *improve statewide consistency in monitoring practices*
- *align Victoria with national best practice*
- *support early detection of unsafe practices through quality assurance and intercomparison participation, and*
- *increase confidence among workers, health services and the broader sector.*

6. *Potential drawbacks may include:*

- *compliance costs for monitoring service providers, including quality-assurance, reporting and performance testing*
- *increased administrative responsibilities for the Health Regulator*
- *transition costs for duty holders required to change or verify providers, and*
- *need for clear guidance to ensure providers understand approval requirements and expectations.*

Recommendation

The Australian Veterinary Association (AVA) supports the introduction of an approval framework for Personal Radiation Monitoring Service Providers (PRMS) in Victoria, recognising the important role high-quality personal dosimetry plays in protecting veterinary professionals, nurses and support staff from occupational exposure to ionising radiation.

Rationale for Support

Improved safety for veterinary professionals and staff

Veterinary workplaces involve a range of radiation exposure scenarios, from fixed clinic-based imaging to mobile and ambulatory radiography in field settings. In these diverse environments, reliable and accurate monitoring is essential to ensure exposures remain within recommended limits and that risks are appropriately managed.

An approval framework aligned with ARPANSA RPS S3 would strengthen confidence in the accuracy, consistency and timeliness of dose measurements across all veterinary contexts.

For veterinary teams, a consistent and robust monitoring system is critical to ensuring that safety standards are maintained regardless of practice size or location.

Harmonisation with other jurisdictions

The AVA strongly supports national consistency in radiation safety regulation. The current absence of an approval framework in Victoria creates inconsistency with other Australian jurisdictions.

Harmonisation is particularly important for the veterinary profession, where practitioners and businesses may operate across multiple jurisdictions or utilise national service providers.

Introducing an approval framework would:

- Align Victoria with national best practice and ARPANSA guidance



- Provide clarity for service providers and users regarding expectations and standards
- Support broader data consistency for occupational exposure monitoring across Australia

Practical Considerations for Veterinary Practice

While supporting the proposal, the AVA emphasises that any mandated requirements must be practical, proportionate and flexible, reflecting the diversity of veterinary service delivery models.

Key considerations include:

- **Harmonisation across jurisdictions:** Nationally consistent requirements are particularly important for the veterinary profession, where practitioners and businesses may operate across multiple jurisdictions or rely on national service providers. Consistency will reduce duplication, improve compliance efficiency and minimise unnecessary regulatory complexity.
- **Applicability across practice types:** Requirements should be scalable and appropriate for small clinics, large hospitals, and ambulatory or field-based practices, where access to infrastructure and administrative support may be limited.
- **Minimising administrative burden:** Processes for compliance (e.g. provider verification, reporting follow-up) should be streamlined and clearly communicated, particularly for smaller practices.
- **Transition arrangements:** Adequate transition periods and guidance will be important to allow veterinary practices to secure providers, or confirm that existing providers, meet approval requirements without disruption to operations.
- **Cost proportionality:** Any increased costs should be carefully managed to avoid disproportionate impacts, especially on small veterinary businesses.

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