



Simon Critchley  
Director, Radiation Health Unit  
Queensland Health  
1 William Street  
Brisbane QLD 4000

By email: [rsreg@health.qld.gov.au](mailto:rsreg@health.qld.gov.au)

9 July 2021

Dear Simon

**Re: Remake of the Radiation Safety Regulation**

I write on behalf of the Australasian Institute of Mining and Metallurgy (AusIMM) in response to your invitation to make a submission on the Radiation Safety Regulation 2010 remake.

AusIMM is the peak body and trusted voice for resources professionals, with more than 13,000 members across more than 110 countries. In Queensland, we are proud to represent more than 2,700 members working at all levels of the mining industry, from exploration through to delivery, and in a range of disciplines including health and safety.

The health and safety professionals within our membership are leaders in their respective fields, sharing our commitment to technical and professional excellence, best practice and a risk-responsive approach that ensures the health and safety of the resources workforce and broader community.

**AusIMM Support Passage of the Remade Radiation Safety Regulation**

Radiation risks in the resources sector arise at several stages across the resources lifecycle, including in the deployment of laser technology for exploration and geological assessment, as well as the mining and processing of naturally occurring radioactive materials such as uranium and rare earths.

AusIMM see that consistent standards, guidelines and practices across the sector are vital to ensure radiation risks are managed appropriately. Our expert professional community provide this leadership through our role in supporting standardisation, research and policy development for the sector.

The Queensland Government propose to remake the Radiation Safety Regulation in its current form, with minor changes to improve clarity, readability, and operational effectiveness. Amendments are also proposed to ensure consistency with the *Australia/New Zealand laser standard*.

With the benefit of insights from AusIMM's Health and Safety Society and Queensland membership, we are pleased to support passage of the remade regulation in its proposed form.

In relation to the labelling and classifying of lasers, we note the remade regulation will require labelling of all lasers above Class 1. This amendment will impact resources operations, although our understanding is that the risk of non-compliance for laser equipment used in mining is relatively low. AusIMM recommend Queensland Health develop clear guidance to support industry in transitioning and ensuring compliance with the revised regulation as appropriate.

**The Australasian  
Institute of Mining  
and Metallurgy**

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AusIMM repeat our thanks to Queensland Health for the opportunity to provide feedback on the regulatory remake., We note a range of radiation safety matters that may fall outside the scope of this immediate project, which we would be glad to discuss further with the radiation safety regulator.

To discuss the matters raised in this letter further, we encourage you to contact Harry Turner, our Government Relations Advisor, who you can reach at [hturner@ausimm.com](mailto:hturner@ausimm.com) or on (03) 9658 6177.

Regards

A handwritten signature in black ink, appearing to read 'Stephen D.', with a stylized flourish at the end.

Stephen Durkin FAusIMM | Chief Executive Officer, AusIMM