Radiation Act 2005

Annual report for the financial year ending 30 June 2025

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Radiation regulation in Victoria in 2024–25: a snapshot

The Health Regulator, established in February 2024, is the main regulatory oversight branch of the Department of Health (the department). Our work includes administering permissions and licensing, monitoring compliance and enforcing the law, and regulatory reform and policy. This includes regulation of radiation practices under the *Radiation Act 2005* (the Act).

The purpose of the Act, which took effect in September 2007, is to protect the health and safety of Victorians and the environment from the harmful effects of radiation.

The Act requires that the Secretary of the Department of Health (the Secretary) publish an annual report that describes the activities of the Secretary under the Act and summarises all authorities issued, renewed, suspended, cancelled, varied, transferred or surrendered during that year. The report must also detail all radiation incidents investigated and summarise all prosecutions for offences in that year

During 2024-25:

- 21,943 current licences or approvals were issued to organisations or individuals to perform some form of radiation practice or for the use of a radiation source
- \$4.3 million was recovered by the department in licensing revenue and returned to the Government's Consolidated Fund
- 432 on-site inspections were conducted by the department as part of its licensing compliance monitoring program
- the department undertook a variety of enforcement actions under the Act
- three radiation safety incidents were investigated by the department.

Introduction

Diagnostic, therapeutic, industrial and other uses of radiation have contributed to safety and quality of life for all Victorians. However, radiation does involve hazards if it is used inappropriately or unnecessarily. For this reason, the department regulates the use of radiation to protect people and the environment from its harmful effects by licensing users of radiation sources and managers of radiation practices under the Act.

Section 134 of the Act requires that the Secretary, in respect of each financial year, publishes a report that:

- describes the activities of the Secretary under the Act
- includes a summary of all authorities issued, renewed, suspended, cancelled, varied, transferred or surrendered during that year
- includes all radiation incidents investigated in that year
- includes a summary of all prosecutions for offences against the Act or the Radiation Regulations 2017 (the Regulations) commenced in that year
- includes any other prescribed matter.

This annual report describes the activities of the Secretary for the 2024–25 financial year (1 July 2024 to 30 June 2025).

Legislation

Radiation Act

The *Radiation Act 2005* (the Act) commenced operation on 1 September 2007, and repealed previous laws.

The Act gives effect to Victoria's commitment to the National Directory for Radiation Protection (NDRP) published by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA). The NDRP outlines a common approach for Commonwealth, state and territory governments in regulating radiation practices.

The purpose of the Act is 'to protect the health and safety of persons and the environment from the harmful effects of radiation' and incorporates:

- the radiation protection principle, consistent with section 7 of the Act, which is the principle that persons and the environment should be protected from unnecessary exposure to radiation through the processes of justification (for establishing a practice), limitation (setting dose limits or imposing other measures to address human and environmental risks), and optimisation (ensuring that the benefits of radiation reduction measures are not outweighed by the cost of radiation reduction measures)
- a requirement for the Secretary to have regard to both the radiation protection principle and the NDRP
- the concept of licensed activities, in particular, the licensing framework created by the Act features
 - management licences that authorise the conduct of radiation practices (such as possessing a radiation source)
 - use licences that authorise a person to use a radiation source
 - radiation facility construction licences
- the concept of approved testers and the testing of prescribed radiation sources against declared radiation safety standards
- the concept of approved assessors of security and transport security plans.

The Act creates significant offences, including:

- conducting a radiation practice without a management licence (in 2024–25, the maximum penalty for a body corporate for this offence was \$1,831,590)
- using a radiation source without a use licence (in 2024–25, the maximum penalty for an individual for this offence was \$244,212)
- non-compliance with the conditions of a management licence (in 2024–25, the maximum penalty for a body corporate for this offence was \$1,221,060).

Radiation Regulations

The Radiation Regulations 2017 (the Regulations) prescribe:

- · licensing fees
- definitions of radioactive material, types of doses and exposures
- 'radiation facility' as a premises used or proposed to be used to house, possess, store or permit the use of any high consequence sealed source or high consequence group of sealed sources
- radiation dose limits
- radiation sources that must be tested and issued with a certificate of compliance before use and at specified intervals afterwards.

How is the Act administered?

The Health Regulator

The Health Regulator within the Department of Health administers the Act.

The Health Regulator is responsible for multiple aspects of health regulation and manages its radiation safety regulatory functions across four specialist units:

- Regulatory Compliance and Operations –
 Environment, containing the Regulated
 Industries team, which inspects industrial
 practices, including transport companies and
 the mineral sands mining sector
- Regulatory Compliance and Operations Health, containing the Regulated Facilities team, which inspects medical, veterinary, dental and chiropractic practices
- Regulatory Services, which carries out various licensing functions, including licensing of radiation practices and users of radiation sources
- Regulatory Reform and Policy (RRP), responsible for radiation regulatory policy.

The licensing framework

The Act contains a licensing framework and a number of related offence provisions. The framework manages:

- 'facility construction' licences, which authorise construction of a 'radiation facility'; currently limited to premises where it is intended to store high consequence radioactive material (material with security requirements mandated, in addition to radiation safety requirements)
- 'management licences', which authorise the conduct of a radiation practice. Radiation practices include:
 - possession of radiation sources (such as X-ray units; CT scanners; radiopharmaceuticals used in nuclear medicine; radioactive sources used in industrial practices e.g., radiography of pipes and welds)

- transport of radioactive material
- sale of radiation sources
- research involving the exposure of persons to ionising radiation
- disposal of radiation sources
- mining or processing of radioactive material (in Victoria's case, mineral sands)
- 'use licences', which authorise individuals to use a radiation source
- 'approved tester' authorities, which authorise individuals to issue certificates indicating compliance with mandatory radiation safety standards for certain types of medical diagnostic X-ray units
- 'approved assessor' authorities, which authorise individuals to issue certificates indicating compliance with mandatory security standards for high consequence radioactive material.

Licence conditions

As technical radiation safety matters change frequently to reflect international and national agreements, they are not provided for under the Act or Regulations. The omission of technical matters within the legislation necessitates a wide-ranging power to make and apply enforceable conditions of licence.

All licences issued by the department are subject to conditions, which are increasingly focused on compliance with nationally agreed practice-specific Codes.

Summary of authorities issued by the department

Section 12 of the Act creates an offence for a person to conduct a radiation practice unless the person holds a management licence or is exempt under section 16 of the Act.

The most common radiation practice requiring a management licence is the possession of a radiation source. Other radiation practices include:

- · transporting radioactive material
- · selling radiation sources
- procuring or arranging research that involves exposing people to radiation
- · mining or processing radioactive material.

Section 13 of the Act creates an offence for a person to use a radiation source unless the person holds a use licence or is exempt under section 16 of the Act.

Data relating to licences and authorities held during 2024–25 are detailed in Tables 1–3.

Table 1: Number of authorities issued, renewed, suspended, cancelled, varied, transferred or surrendered under the Act in 2024–25

Authority	Management licence	Use licence	Tester	Assessor
Issued	194	2479	4	0
Renewed	848	6319	13	0
Suspended	0	0	0	0
Cancelled	0	0	0	0
Varied	790	800	6	0
Transferred	66	n/a	n/a	n/a
Surrendered	26	9	0	0

Table 2: Number of authorities issued as of 30 June 2025

Authority	Number
Use licences	18,943
Management licences	2979
Approved testers	55
Approved assessors	6

Table 3: Sectors in which licences are held under the Act in 2024-25

Sector	Management licence	Use licence
Dental	1585 (47.91%)	6122 (32.02%)
Veterinary	398 (12.03%)	3100 (16.22%)
Medical	252 (7.62%)	7147 (37.39%)
Industrial	242 (7.32%)	1537 (8.04%)
Sales	159 (4.81%)	n/a
Chiropractic	70 (2.12%)	220 (1.15%)
Transport	56 (1.69%)	n/a
Education	34 (1.03%)	101 (0.53%)
Mining	3 (0.09%)	n/a
Other	509 (15.39%)	890 (4.66%)

Revenue

 Approximately \$4.3 million was collected in licensing revenue during 2024–25 and returned to the Government's Consolidated Fund.

Fee policy

The Department of Treasury and Finance's Pricing for Value Guide assists Victorian Government departments and agencies to set pricing to recover the costs of regulating and delivering services. Consideration is given to achieving an appropriate level of cost recovery associated with the costs of regulating and delivering services, in accordance with pricing principles. These principles aim to balance achieving sustainable funding, reducing costs, improving user experience and service quality, improving equity, and increasing administrative simplicity along with cost recovery.

Having regard to these principles, the department's aim is to recover the full cost of the administration of the Act as equitably and sustainably as possible. This is done by setting fees based on the following considerations:

- applications for use licences attract a fee consisting of a non-refundable application fee plus a licence fee based on the period of the licence; the longer the licence, the higher the fee. However, a small discount may be applied for longer licence periods to reflect the slight reduction in administrative burden associated with longer period licences
- the fee for a use licence does not depend on the type of radiation source proposed to be used

- applications for a management licence attract a fee based on a non-refundable application fee plus a licence fee based on a combination of factors, including:
 - the types and numbers of radiation sources to be possessed. Sources deemed to represent a higher risk to workers, patients or the environment attract a higher fee compared to sources considered to be of lower risk
- applications for an approved assessor's authorisation do not currently attract a fee.
 This absence of a fee reflects the department's policy of removing disincentives to work in this area
- due to billing limitations, there is currently no fee charged for a facility construction licence.
 This may be subject to review at a later date.

2024-25 fees

Licensing fees are defined by the Regulations in terms of the number of 'fee units' that relate to the application or licence. The value of a fee unit is set by the Victorian Treasurer through a direction made under section 6 of the *Monetary Units Act 2004*. The direction is published in the Victorian Government Gazette.

In 2024-25, the value of a fee unit was \$16.81.

The licensing fees for each year are published on the <u>department's website</u>.

https://www.health.vic.gov.au/radiation/a-list-of-the-prescribed-fees-for-radiation-licences.

Enforcement activity

Providing advice and education to duty holders will always be the first step in seeking compliance with the Act and the Regulations. However, there may be some instances when enforcement action is required.

The Act provides the department with several enforcement tools in addition to the power to prosecute.

Improvement notices

The Secretary, or a delegate of the Secretary, may issue an improvement notice if they believe that a person has either contravened, or is likely to contravene, a provision of the Act or the Regulations in circumstances that make it likely that the contravention is continuing or will reoccur.

When issued, an improvement notice requires the person to remedy the contravention or likely contravention, or the matters or activities causing the contravention or likely contravention.

Prohibition notices

Like improvement notices, prohibition notices may be issued by the Secretary or their delegate under the same circumstances of a likely or actual contravention of the Act.

A prohibition notice may prohibit the person from carrying on the activity, or the carrying on of the activity in a specified way, until the Secretary or their delegate has certified in writing that the contravention has ceased or that the likelihood of the contravention occurring has passed.

Show cause notice

The Secretary, or their delegate, may issue a show cause notice notifying a licence holder of an action the Secretary, or their delegate, proposes taking in relation to a contravention of a requirement of the Act, with an invitation to the licence holder to show cause why the

proposed action should not be taken. A show cause notice may also propose a period of suspension of a person's authority under the Act.

Executing a search warrant

While the Act provides power for authorised officers to enter certain places to monitor compliance with the Act or the Regulations, under some circumstances it is necessary to first obtain a search warrant to authorise that access.

An authorised officer of the department may apply to a magistrate to issue a search warrant if the authorised officer believes on reasonable grounds that there is, or may be within the next 72 hours, a particular thing (including a document) at the place that may afford evidence of an offence against the Act or the Regulations.

Seizure of articles

The Act gives certain powers to authorised officers, including the power to seize anything (including a radiation source or a document) if the authorised officer reasonably believes:

- the seized thing is connected with an alleged contravention of the Act or the Regulations,
- there is a serious risk to the health or safety of any person or the safety of the environment if the thing is not seized.

Making a radiation source inoperative

The Act gives an authorised officer power to make a radiation source inoperative.

Sealing a radiation source

The Act gives an authorised officer the power to seal a radiation source. In practice, sealing a radiation source may be required where it is impractical to seize the source, but it is necessary to prevent its further use.

Suspending or cancelling an authority

The Act provides that the Secretary or their delegate may suspend or cancel an authority.

Prosecution

There are several significant offences contained within the Act, and under certain circumstances, the department may feel it is necessary to begin prosecutions for these offences.

2024–25 enforcement actions undertaken

Table 4 summarises the enforcement actions undertaken by the department during 2024–25.

Search warrants

One search warrant was obtained and executed in relation to a suspected commercial tanning operation. This resulted in the seizure of a tanning unit, and the department is considering prosecution in relation to this.

Improvement notices

Two improvement notices were issued in relation to incidents described under *Incidents investigated by the department* – one to a transport company and another to a geotechnical company.

Three other improvement notices were issued in 2024–25:

an improvement notice was issued to a
 public health service when it was found that
 their radiation management plan did not
 sufficiently satisfy the requirements of the
 ARPANSA Code of Practice for Radiation
 Protection in the Medical Applications of
 Ionising Radiation (2008). This was because
 it did not specify the use licence
 requirements for persons using the sources

- possessed by the management licence holder
- an improvement notice was issued to a supplier of medical diagnostic X-ray equipment, as it was established that equipment supplied by the licence holder did not comply with the relevant radiation safety standard, placing the licence holder in breach of their licence conditions
- an improvement notice was issued to a
 public hospital when it was established that a
 number of incidents had occurred due to a
 faulty digital imaging processing unit being
 used for producing dental intra-oral X-ray
 images. The improvement notice required
 that the processing unit be repaired or
 replaced.

Prohibition notices

Four prohibition notices were issued in 2024–25:

- three prohibition notices were issued in relation to the alleged unlicensed use of a dental cone beam CT (computed tomography) unit – two notices were issued to individuals alleged to have used the unit without appropriate authorisation on their use licence, and one notice was issued to the management licence holder
- another prohibition notice was issued to an organisation where there was reason to believe that the organisation possessed a Cs-137 (caesium-137) sealed source, for the purposes of calibration, without a management licence authorising its possession.

Sealing of radiation sources

Four diagnostic X-ray units were sealed during the reporting period: a medical general X-ray unit, a medical CT unit, a dental panoramic/cephalometric X-ray unit and a dental cone beam CT unit.

The medical general X-ray and CT units and dental panoramic/cephalometric X-ray unit were sealed when the licence holder ceased trading

and was no longer in possession of the sources.

The dental cone beam CT unit was sealed as there was no licence authorising its possession. The dental cone beam CT was unsealed when a licence authorising its possession was granted, while the medical general X-ray and CT units and dental panoramic/cephalometric X-ray unit remained sealed at the end of 2024–25.

Seizures

An Sr-90 (strontium-90) applicator source, used for the treatment of ophthalmic conditions, was seized from a disused medical clinic when the licence authorising its possession had expired. The former licence holder had ceased trading and was no longer in possession of the source.

The source has since been disposed of with the disposal arranged and paid for by the former licence holder.

Table 4: Enforcement actions in 2024-25

Enforcement action	Number
Improvement notice	5
Prohibition notice	4
Show cause notice	0
Execution of a search warrant	1
Sealing a radiation source	4
Seizure of commercial tanning unit	1
Seizure of (ionising) radiation source	1
Prosecutions initiated	0
Licences suspended	0

Compliance monitoring overview

Compliance with the requirements of the Act in relation to radiation practices is primarily monitored through inspections. Where possible, the department promotes compliance by offering advice and constructive guidance, and by using technology and systems that help licence holders to understand and comply with the laws and standards applicable to them.

The department conducted 432 on-site inspections during 2024–25 as part of its licensing compliance monitoring program. Risk-based and targeted use of resources as well as competing priorities meant this was slightly below the Victorian State Budget target of 480 inspections. The compliance monitoring program also included inspections of specific types of radiation practices to monitor compliance with safety or security standards, and inspections in relation to non-renewal of management licences.

Medical, veterinary and dental radiation practices

A total of 264 on-site inspections were conducted of medical, dental and veterinary radiation practices during 2024–25.

Medical radiation practices

Compliance monitoring

Inspection programs started in previous years focused on compliance with requirements pertaining to justification and approval of CT (computerized tomography) procedures, and compliance with requirements pertaining to the use of DXA (Dual-energy X-ray absorptiometry) for the purpose of assessment of body composition. These inspection programs were completed in 2024–25.

A new inspection program, focusing on diagnostic reference levels (DRLs), was conducted during 2024-25. The aim of this inspection program was to assess compliance with the DRL requirements of the Code of Practice for Radiation Protection in the Medical Applications of Ionizing Radiation (2008). The purpose of a DRL program is to assist in assessing optimisation of protection during the medical exposure of patients for diagnostic and interventional procedures, by evaluating doses administered to patients and comparing them to nationally derived DRLs. Licence holders that conduct CT, interventional fluoroscopy, and/or nuclear medicine procedures are required to periodically conduct a review of doses administered to patients for procedures where national DRLs have been established.

The introduction of this program has contributed to improved compliance monitoring by providing clearer benchmarks for dose optimisation and facilitating more consistent interpretation of regulatory requirements across licence holders.

The department is also currently developing a new inspection protocol that will result in a

broader assessment of activities for compliance. It will include assessment of compliance with requirements pertaining to Radiation Management Plans, quality assurance and equipment testing, reporting and investigation of incidents, and patient identification procedures.

Other inspections within the medical sector related to a variety of specific circumstances, such as:

- pre-licensing construction inspections of new facilities
- inspections relating to investigations of reported radiation incidents, or where there were allegations or suspicions of non-compliance
- premises inspections where a management licence had expired and had not been renewed
- attendance to observe new technologies and assess any potential impacts on licensing requirements.

Mandatory testing of medical diagnostic X-ray units

A prescribed radiation source may only be used for human diagnostic purposes if there is a current certificate of compliance in place. During 2024–25, the department continued to monitor licensees for compliance with the testing requirements and to monitor approved testers for compliance with both the conditions of their authorisation and with the provisions of the Act.

A high level of compliance with the requirement to hold a current certificate of compliance (approximately 87%) was observed during 2024–25.

Radiotherapy Special Interest Group

The Radiotherapy Special Interest Group (RSIG) was established in 2021 by the department to ensure information about the growing and complex area of medical radiation is shared across different areas of the department.

The RSIG comprises team members from the Health Regulator, Regulated Facilities (Radiation), Regulated Facilities – Private Hospitals, as well as staff from Hospitals and Health Services Division – Statewide and Specialist Programs Unit, and Operational Support and Improvement Policy.

The RSIG met every 4 months with the aim of:

- fostering a collaborative network within the department to share information between groups
- promoting and improving radiation therapy within Victoria
- discussing developments that impact best practice and safety for radiation therapy
- removing obstacles to the department's successful delivery of radiation therapy services
- providing the necessary transparency of information for the licensing of new radiation therapy facilities and providers.

Veterinary radiation practices

During 2024–25, compliance monitoring of veterinary radiation practices focused on suspected unlicensed practices and high-risk practices involving Sr 90 (strontium 90)

applicators used for therapeutic purposes. This monitoring resulted in two Sr 90 applicators being removed from use due to exceedance of their recommended working life. The work has also highlighted the need for additional regulatory requirements for sources that have reached their recommended working life. Compliance monitoring in this area is expected to continue in the 2025–26 financial year.

Dental radiation practices

During 2024–25, compliance monitoring of dental radiation practices focused on inspections of new licence holders; practices possessing 3D volumetric X-ray units; practices where there were allegations or suspicions of non-compliance; and premises where a management licence had expired and had not been renewed.

Common areas of detected non-compliance included: identification of unlicensed practices (e.g. possessing an X-ray unit without appropriate authorisation on a management licence); unlicensed use (e.g. using an X-ray unit without appropriate authorisation on a use licence); inadequate implementation of the relevant shielding assessment; and noncompliance with licence conditions, such as the requirement to notify the department of the acquisition and/or disposal of X-ray equipment, the requirement to provide personal radiation monitoring, or the requirement to service X-ray units in accordance with the Code of Practice for Radiation Protection in Dentistry (2005). published by ARPANSA.

Industrial radiation practices

During 2024–25, compliance monitoring of various industrial sectors was conducted, with a particular focus on two areas of high radiation risk: the transport of radioactive material and the security of high consequence sealed radioactive sources.

A compliance inspection program, targeting licence holders authorised to transport radioactive material in Victoria, was continued to assess compliance with the ARPANSA Code for the Safe Transport of Radioactive Material (2019). Compliance with this code is a condition of management licences that authorise the transport of radioactive material. As required under the Code, a key focus was the development and implementation of radiation management programs by transport companies. Such programs include appropriate training of personnel, emergency response procedures and appropriate radiation monitoring during transport.

An inspection program to audit the approved security plans of licence holders authorised to possess high consequence sealed sources was also continued. The purpose of this inspection program was to ensure that the security plans developed by the licence holders were fully implemented, and that all the required physical security measures were in place.

A total of 168 on-site inspections were conducted of industrial practices during 2024-25.

Mining of mineral sands and rare earths

The department regulates the processing, storage, transport and disposal of the naturally occurring radioactive material associated with mineral sand mining and processing. The mining of mineral-rich sands within Victoria generally triggers the need to regulate the radiation safety aspects of the operations, due

to the presence of naturally occurring radioactive material in low concentrations.

Mineral sands within Victoria are usually mined from ancient beaches, like those that existed in the Murray Basin. Mineral sands were deposited on shores where the large density of their grains allowed them to settle close to the shore and be concentrated there, while lighter sands tended to be washed out to sea. There are currently three companies licensed under the Act to conduct mineral sand mining and processing in Victoria: Iluka Resources Limited, Donald Mineral Sands Pty Ltd and WIM Resource Pty Ltd.

Other projects have been proposed and are currently at various stages of the approval process, which typically includes a formal environmental effects assessment. Five of these projects are in the Murray Basin, and a sixth is in East Gippsland.

Commercial tanning practices

Under section 23D of the Act, it is an offence to conduct a commercial tanning practice.

In 2024–25, the department obtained one search warrant for a premises, which resulted in the seizure of a tanning unit. The department is considering prosecution in relation to this.

Once tanning beds are forfeited to the department, the components in the ultraviolet light tubes, including the glass and mercury, are safely removed and recycled and the tanning beds are destroyed.

Incidents investigated by the department

The department responded to three incidents in 2024–25.

In August 2024, the department responded to an incident in which a portable radiation gauge was damaged by heavy machinery at a construction site while measurements were being taken with the gauge. The gauge was retrieved from the site and transported to the department's interim radiation storage facility.

A follow-up investigation, conducted in September 2024, determined that factors contributing to the incident included inadequate incident response from the operators. This was found to be due to a lack of appropriate training for technicians, technicians not following the procedures for incident management documented in the company's radiation management plan, and the site not having a radiation safety officer available to make assessments and provide advice during the incident.

In April 2025, an improvement notice was issued to the company pursuant to section 90A(1)(a) of the Act, requiring the company to address these shortcomings. In December 2024, the company arranged for the damaged gauge to be collected from the department's interim storage facility and disposed of in accordance with regulatory requirements.

In February 2025, the department was notified by the New South Wales Environment Protection Authority (NSW EPA) that a package containing radioactive material, intended to be delivered to the NSW EPA, was overdue. Attempts by the NSW EPA to locate the package revealed that its last verifiable location was Tullamarine Airport (Melbourne). The package had been transported by a company holding a radiation management licence, but not a licence authorising the transport of radioactive material. The department interviewed the company, and the package was subsequently located at Melbourne Airport and seized by the department on 7 February 2025. In May 2025, the NSW EPA arranged for the safe transport of the package to its interim radiation storage facility.

The department's follow-up investigation determined that the transport company involved believed that a transport licence was not required, as the package had been labelled in error as an "excepted package". In April 2025, an improvement notice was issued to the transport company pursuant to section 90A(1)(a) of the Act. The company revised its internal policies and procedures to preclude transport within Victoria of any package containing radioactive material.

In February 2025, the department was also contacted by a member of the public who was attempting to dispose of a Hammer dosimeter (a special type of X-ray therapy dosimeter) containing 2.2 megabecquerel of radium-226. The person had power of attorney for an elderly individual who possessed the Hammer dosimeter and had now moved to an aged-care facility. The Hammer dosimeter was seized by the department in February 2025 and taken to its interim radiation storage facility.

Secretariat support for the Radiation Advisory Committee

During 2024–25, the department continued to provide secretariat support to the Radiation Advisory Committee, established under Part 10 of the Act.

The Committee provides advice to the Minister for Health and the Secretary on all aspects of radiation safety. The Committee's role and current members are described further at Radiation Advisory Committee.

https://www.health.vic.gov.au/radiation/radiation/radiation/radiation-advisory-committee

An annual report of the Committee's work is tabled in the Victorian Parliament each year and is available on the <u>department's website</u>: https://www.health.vic.gov.au/publications/radiation-advisory-committee-annual-report>