

# OFFICIAL



Environment Protection Authority

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30th August, 2024

Dear Key Stakeholders of Veterinary Services,

***The EPA is pleased to inform the Veterinary industry of a significant update regarding Radiation Use Licensing for Veterinary Nurses/ Veterinary Technologists (or Technicians) in South Australia.***

Historically, veterinary nurses and veterinary technicians have been unable to obtain a Use Licence in South Australia and have therefore been unauthorised to perform routine veterinary radiography. The South Australia EPA wishes to advise that Veterinary nurses and Veterinary Technologists (Technicians) are now eligible to apply for a Use Licence to perform routine plain veterinary (X-ray) radiography. This change will align South Australian Radiation Use Licensing with the practices of interstate jurisdictions.

## **Key Details:**

- **Licence Requirement:** Veterinary Nurses and Technologists must hold a Use Licence to perform routine veterinary radiography. This will now be permitted without the need for direct, in-room supervision by a veterinary surgeon.
- **Accepted qualifications:**
  1. A Bachelor's degree in Veterinary Technology from an Australian University; or
  2. A Certificate IV in Veterinary Nursing.

## **Clarification on licensing and exemption:**

*The South Australian Radiation Protection and Control (RPC) Regulations 2022 (Regulation 18) does not permit any unlicensed vet nurses/technicians or other persons to perform routine veterinary radiography.*

It is important to note that Regulation 18 only permits the unlicensed operation of radiation apparatus in veterinary applications if the following criteria are all met:

- (a) The persons who operate the ionising radiation apparatus according to the instructions of a veterinary surgeon who-
- i) holds a radiation use licence in respect of the apparatus; and
  - ii) is present in the room or other place in which the apparatus is located; and
  - iii) is not able to operate the apparatus by themselves by reason of the nature of the radiological examination being carried out;

To clarify, Regulation 18 does not provide a general exemption for unlicensed persons. The Regulation 18 only allows an unlicensed person (a vet nurse or technician) to operate X-ray apparatus if the licensed Veterinarian is present in the room and gives direct instructions for the operation- and even

then, operation by an unlicensed person is only permitted if the licensed veterinarian present in the room is unable to operate the apparatus themselves because they are either holding the animal undergoing the X-ray or otherwise unable to press the exposure button because of the nature of the examination they are carrying out on that animal undergoing the X-ray.

The EPA reminds veterinary staff that the performance of routine veterinary radiography by unlicensed individuals is in direct breach of Section 24 of the *South Australia Radiation Protection and Control (RPC) Act 2021*. Reports of unlicensed activity may result in compliance enforcement action including expiation or legal proceedings, with penalties up to \$250,000.

**Application process:**

Veterinary Nurse and Technologist (technician) can apply for radiation use licenses via the following links:

[EPA Radiation Use Licence Application](#)

[ELF Radiation Application Portal](#)

We appreciate your attention to this important update and encourage all relevant personnel to ensure compliance with the new licensing requirements.

For further information or assistance, please contact the EPA Radiation branch at: [EPARadiationProtectionBranch@sa.gov.au](mailto:EPARadiationProtectionBranch@sa.gov.au)

Yours sincerely,

RADIATION HEALTH LICENSING LEAD

**ENVIRONMENT PROTECTION AUTHORITY**