



CIRCULAR

Industrial Compliance Testing

This circular is to advise of forthcoming amendments to the Radiological Council's Industrial Compliance Testing Program which will come into place from the **1st January 2026**.

Changes have been made to the Compliance Testing Program Requirements and Compliance Testing Licence conditions; wherein:

- only tests with non-compliance will need to be submitted to the Radiological Council.
- compliance testers will issue Certificates of Compliance for compliant gauges to the registrant.
- compliance tests for compliant gauges do not need to be forwarded to the Council.

Background

Compliance testing was introduced in July 2000. The aim of the program was to formalise the existing mandatory requirements for testing of industrial radiation equipment that fall under the relevant industry-specific Codes of Practice.

The Council recognised that radiation-producing equipment used in some industrial applications can be a significant source of unnecessary radiation exposure to workers if the equipment is not operated and maintained in accordance with the required standards and industry-specific Codes of Practice. Proper oversight and inventory management also minimise the risk of radioactive sources entering the scrap metal recycling industry.

Council also recognised that quality assurance programs for industrial radiation equipment had been developing in Australia and nationally, with programs mandatory in a number of jurisdictions.

In Western Australia, formal compliance testing under this program has thus far been applied only to fixed gauges. For fixed gauges, compliance testing is required every 36 months; however, the relevant Code of Practice requires the owner to test and examine their gauges in accordance with the Code every 12 months. Many owners use this testing to conduct their annual checks.

Program structure

The program consists of –

- ***Program Requirements***
This provides the full details of the requirements and expectations for the program.
- ***Workbooks***
The workbooks supplement the Program Requirements and describes the methods for standard compliance tests, and the assessment and evaluation for each test.

There is one workbook which is for fixed gauges, with the program allowing for future workbooks to be applied for other radiation producing equipment. A test worksheet is provided in the workbook.
- ***Licensed Testers***
The test, assessment and evaluation are required to be conducted by a compliance tester licensed under the Radiation Safety Act (the Act), or by a person working under the direction and immediate personal supervision of a licensed tester.
- ***Compliance certification***
Until 31st December 2025, the program requires the compliance tester to submit their report to the Radiological Council for assessment. The company is required to report on the actions taken to mitigate any issues reported.

31 October 2025

Queries:

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Program changes for fixed gauges

The following changes will come into place from the **1st January 2026**. Up until this date, the existing requirements apply.

Program Requirements

The program requirements have been amended to reflect changes relating to the issuing of Certificates of Compliance. Previously all test reports were sent in to the Radiological Council where Council officers would assess these and issue a Certificate of Compliance to the registrant. The amendments to the program requirements now require that only test reports containing non-compliance need to be provided to the Radiological Council. Test reports for compliant gauges are to be sent to the registrant only.

For compliant gauges the licensed compliance tester will now issue a Certificate of Compliance to the registrant.

The template for this Certificate of Compliance and further information can be found in the updated program requirements.

Compliance Testing Licence Conditions

The licence conditions have been updated to reflect the above change in the program requirements. These changes direct the licensee to:

- ensure that any faults found, or found and corrected, during testing are detailed in the test report and reported to the registrant and Radiological Council;
- provide a Certificate of Compliance and associated test reports for all compliant gauges tested to the registrant.

Quality Control

The Council will employ strategies to ensure that the test reports and Certificates of Compliance issued meet the requirements of the compliance testing program. Test reports and Certificates of Compliance may be requested from the registrant at any time, including at inspection or renewal of

registration. The changes to this program will be reviewed at regular intervals.

The updated documents are now available for download from Council's website, www.radiologicalcouncil.wa.gov.au/Registrations/Common-Requirements/Compliance-Testing. Should you identify any issues when using the workbook, please contact our office.

Enforcement of program

The Council is empowered under Regulation 23 of the Radiation Safety (General) Regulations to implement a compliance testing program. Compliance testing is the responsibility of the registrant as the specific requirements of the program are imposed under Section 36 of the Radiation Safety Act (the Act) as a condition of registration.

A compliance testing licence is normally issued to those with a use-licence as the tests are predominantly taken from the Code of practice, and the use-licence holder must already be familiar with these requirements.

Queries

Should you identify any issues with the updated documentation or have any queries regarding the program amendments please contact our office.