

## **Response to the Repeal of PEI's Public Health Act Radiation Safety Regulations**

The Canadian Organization of Medical Physicists (COMP) would like to express its concern regarding the decision of the Government of Prince Edward Island's Department of Health and Wellness to revoke its radiation safety regulations.

COMP is the main professional body for medical physicists practicing in Canada. Our membership is composed of professional physicists, scientists and academics located at universities, hospitals, cancer centres and government research facilities. Every member has an educational or professional background in physics or engineering as it applies to medicine. The work of Medical Physicists involves the use of physical agents for diagnosis and therapy in patient care (including x-rays and radioactive materials) within the support of regulatory guidance and professional practice.

The repeal letter of July 20, 2016 states that "Since the implementation of the Radiation Safety Regulations more than 30 years ago, there have been significant changes in the applications and technologies associated with radiation emitting devices". While this is true, it is important to understand that the invisible nature of the hazard involved has not changed and that the change in applications and use cited in the repeal letter actually means that there is now increased workplace and public risk.

The invisible nature of radiation, and the possibility of it being a carcinogen at medical doses, means the risks and benefits of medical radiation must be constantly evaluated to ensure that the benefit of using these devices outweighs the potential harm. For example, with the interventional use of radiation there is a possibility of causing radiation burns that may not present themselves for weeks after the procedure. Without the regulatory requirement to assess these scenarios up front and communicate the potential risks to patients, this potential harm may be overlooked and healthcare providers may not be aware that they are causing this harm.

Regulations are absolutely necessary in order to ensure that issues of patient safety and standards of practice are held in focus, continually improved and where necessary, enforced. There is a lot more to these regulations than radiation safety. There is also a strong quality component and a restriction on who can expose patients to radiation. The ultimate goals of such regulation are to ensure high-quality health care and the safety of patients, staff and the general public. In the absence of this regulation, there is increased reliance on other occupational health and safety regulations which likely do not extend to patients, both adults and children.

We believe the revocation of the radiation safety regulations is not representative of a body that is obligated to ensure quality of care. The regulations should be reviewed and revised to ensure that they are consistent with the current healthcare context and we urge the Department of Health and Wellness to re-consider its decision to revoke them.