

## **The Commission must demonstrate specific actions to protect children and pregnant women from radiation exposure.**

This ICRP draft strongly recommends paying special attention to children and pregnant women who may be at a higher radiation risk than other individual groups, based on experiences of nuclear accidents in Chernobyl and Fukushima. The Commission also points out that thyroid dose monitoring and stable iodine administration are particularly important for the protection of children and pregnant women. However, the Commission does not provide specific actions to protect pregnant women and children from exposure and recommends the same standard level ( $\leq 100\text{mSv}$ ) as skilled workers. This is inconsistent with the above recommendations and is insufficient.

The Commission should exclude children and pregnant women from emergency responders and provide a low reference level for groups that should be protected from radiation exposure. The Commission should strongly recommend that the central government evacuate groups that should be protected from radiation exposure early.

## **Area division that ignores soil contamination is not sufficient to prevent radiation exposure.**

Following the Chernobyl accident, the corresponding government classified the off-site areas using soil contamination and effective doses and provided social compensation, taking into account the risks of external and internal exposure. This regional classification is reasonable in that it considers the route of radiation exposure.

On the other hand, soil contamination was not considered in the Fukushima nuclear accident, and the Japanese government defined the contaminated area using only the effective dose estimated from the external exposure dose.

The classification of these contaminated areas has not been determined in consultation with stakeholders such as residents and farmers. It must be pointed out that this unilateral zoning increases the risk of exposure to contaminated food and causes great damage to farming.

The Commission should recommend that relevant governments consider regional classification and exposure routes based on scientific evidence that examines soil contamination and considers exposure routes.