

**Public comments regarding the draft ICRP report,
Update of ICRP Publications 109 and 111**

Submitted by Motomi Ushiyama M.D.

sgmmch-u@hokuou-iryuu.or.jp

October 24, 2019

I am a clinical physician living in eastern Japan and the mother of children who were elementary and junior high school students at the time of the nuclear accident. I am consulting the health of children diagnosed with thyroid cancer after the Fukushima Daiichi Nuclear Power Plant (FDNPP) accident.

After reading the new ICRP draft report, I felt that there was a lack of understanding of the current situation in Fukushima and Japan. I cordially request you to read the comments below and amend the report.

➤ Comments on Article **6. CONCLUSIONS (222)**

It is of my strong belief and opinion that all the citizens must be clearly informed and educated that the accident in Nuclear Powerplant does “make people and society severely anxious”, and that “the affect by the Nuclear accident to society, environment and economy as well as the responses/reactions to the accident are absolutely serious which will surely last longer”. An intentionally biased PR occurs nationally in Japan stating that “Nuclear Powerplants are accident-free and absolutely safe”, many of those have been built in depopulated areas with few industries, despite the fact that Japan is earthquake-prone country. ICRP should not promote building Nuclear Powerplants in quake-prone countries like Japan if they really want the safe operation in Nuclear Industry.

➤ Comments on Article **6.CONCLUSIONS (227)**

An actual radioactive contamination is creating hot spots in unexpected area along with complex terrain. This phenomenon has been seen in both Chernobyl and Fukushima. Telling exposed and non-exposed survivors is truly difficult, however, there is a fact that government designates only Fukushima as exposed area (such as prefectural health surveys being conducted only in Fukushima, etc). Under that circumstances, the “experts” call Fukushima residents as “examinee” and proudly state that “a big project of low-dose exposure begins with Fukushima”.

The unprincipled scholars publishing fake paper of underestimating the Nuclear accident damage are lionized, and scholars with lots of good common sense who objected to fact of forcing children to be exposed to 20mSv a year are hurt. I have once heard that a committee from ICRP said “genral public cannot understand the risk of radioactivity”. I must say it’s a matter of not giving full and easy explanation to the public, and is a very irresponsible testimony of no respects to the general public with human rights and dignity whatsoever.

➤ **Comments on Table 6.1. Reference levels for optimisation of the protection of people in the case of nuclear accidents.**

In Japan, a law defines that no additional radiation exposure more than 1mSv a year should not be given to the “public” and that the additional radiation exposure in a gestational perriod must not exceed 1mSv for those expectant mothers who are working in medical field. What is the reason behind by saying “the ordre of 1mSv” instead of “1mSv as upper limit”? An emigratton right is given in Chernobyl if the radiation exposure is exceeding 5mSv.

In Japan, an “emergency” that residents in Fukushima is going on, including new born babies an pregnant women, who are being asked to endure with the exposure up to 20mSv a year. Even if a statement denying an association between exposure and childhood thyroid cancer or perinatal mortality rate is given, such reasons have not been fully explained, anxiety and disastifaction with the administration are only increasing. Even with medical exposures of several mSv, there are many reports that childhood leukemia and breast cancer are significantly increasing, depending upon the type of gene mutation,. It’s been only 8 years since the accident occurred in Fukushima. It is yet premature to judge health harzards caused by low-dose exposure and internal exposure, and medical resarch is not sufficient yet. It is hard to understand why the public exposure limit is set at 10 mSv per year at this early stage. I must say this is an act to ignore all the dignity and human rights of everybody, the public and all those exposed people.