The Asia-Pacific Journal: Japan Focus
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20 Millisieverts for Children and Kosako Toshiso's Resignation
May. 01, 2011

児童を対象とした２０ミリシーヴェルト基準と小佐古敏荘の内閣官房参与辞任

Tokyo University Professor Kosako Toshiso, a specialist on radiation safety, has resigned his position as Special Advisor to the Cabinet.

In the past, Kosako has supported Japanese government views on radiation in a variety of contexts. For example, from 2003 he testified on behalf of the state in an important court case in which victims of the atomic bombings sought to force an official broadening of the definition of "atomic bomb related illnesses". He supported the government's assertions that many medical conditions of survivors should not be considered related to the atomic bombs.

In the wake of the Fukushima Daiichi crisis, Kosako was appointed as a Special Advisor to the Cabinet on radiation safety issues. According to his resignation statement, Kosako was confronted with a lack of government openness, poor cooperation with international organizations, and an ad hoc decision making process that he argues has put political and administrative convenience before public health.

Castigating government irresponsibility, Kosako singles out the decision to permit 20 millisieverts of radiation exposure for Fukushima school children. 20 millisieverts, he argues is at the extreme high range for exposure in emergency situations. He wonders why this emergency standard for short term exposure in a crisis is being applied in areas where the school year for children, the part of the population most vulnerable to radiation, will proceed normally.

As of April 29, 800 groups and 34,000 individuals have signed a petition calling for the Japanese government to significantly lower the 20 millisievert limit. The Mainichi reports calls to reconsider this standard from within Fukushima and at meetings of activists in Tokyo.

Below is a translation Kosako's resignation statement by Tanaka Izumi.

Regarding my resignation as a Special Advisor to the Cabinet

(Declaration of Resignation)

Toshiso KOSAKO, Special Advisor to the Cabinet

29 April 2011

On 16 March 2011, I, Toshiso Kosako, was appointed as a Special Advisor to the Cabinet and, on the same day, started to participate in activities aimed at resolving this nuclear emergency [in Fukushima]. It is already a month and a half since the emergency started, and various measures have been taken so far for resolving the situation, I have decided to cease my activities as the Special Advisor to the Cabinet after 30 April and today I have been to see the Prime Minister to notify him of my intention. I have recorded my activities so far as the Special Advisor in a report "Regarding the measurements for the accident at Fukushima Daiichi Nuclear Power Plant". I have already sent this document to the Prime Minister and to those who have been involved with the matter.

My duty was "to provide information and to give advice to the Prime Minister". Since I do not want a repetition of what the government has already been doing, I have reviewed the activities of the Nuclear Emergency Response Headquarters, Nuclear Safety Commission, Nuclear and Industrial Safety Agency, Ministry of Education, Culture, Sports, Science and Technology one by one, and whenever I found any incomplete or inappropriate elements in their response, I have provided information and advice or proposals [to the Prime Minister].

Specifically, official measures in this nuclear emergency are being taken in two different areas, one to do with the nuclear power plant and the other to do with the environment, radiation and local residents, I, Kosako, have been mainly focusing on the latter, on areas of radiation protection. However, as the situation of the plant and the effects on the environment and residents are interconnected, I have cooperated with specialists in the fields of Reactor Systems Engineering and Nuclear Safety Technology to pursue my activities. Furthermore, as the overall affair is connected with judgments of the cabinet and politicians, I have cooperated with Tetsuro Fukuyama, the Deputy Chief Cabinet Secretary, Goshi Hosono, the aide to the Prime Minister, and Seiki Soramoto, a member of the House of Representatives whom the Prime Minister has appointed directly. During this period, there have been numerous urgent matters that required prompt response, but measures for resolving the situation at the plant as well as for preventing harm to the environment and for informing residents [of risks] were not sufficient. Therefore, on 16 March, an "Advisory Team (Head of the Team being Seiki Soramoto, the member of the House of Representatives) " was established to support the Nuclear Emergency Response Headquarters and United Response Headquarters. We have submitted each of our "proposals" to the Prime Minister's office and the Response Headquarters promptly.

Some of [our recommendations] have been realized as actual measures. But there are some proposals that are being left out and areas where no official measures have been taken. I have considered many things in areas such as "what needs to be done based on law and justice?" and "what needs to be done based on international common sense and humanism?" and I will outline my views in the following paragraphs. Regarding some of the measures taken by the government, I

wish to see them promptly reconsidered, followed by implementation of correct measures.

1. Any measures taken in this nuclear emergency need to be based on “Law and Justice”

During the past month and a half, I have made various "proposals" [to the government], and I have considered the following especially important: Necessary measures during nuclear emergencies are similar to other emergencies in that necessary steps and actions written in associating laws regarding Nuclear Emergency Preparedness, as well as Guidelines and Manuals for Nuclear Emergency should be treated as a baseline for deciding on what measures are to be taken. However regarding this particular nuclear emergency, the cabinet and administrative institutions seemed to have had utter disregard for them, and they were instead being very short-sighted and took "flexible responses", which resulted in slowing down the process of resolving the problems.

The Nuclear Safety Commission in particular is an institution that should be standing at the center of technical directions and advice when it comes to nuclear emergency measurements. However, I would like to note that when implementations of lawful procedures and judgments based on the basics of radiation protection are considered, they seemed to be insufficient to a considerable degree.

For example, radiation exposure doses of the residents (past and future) should be calculated using System for Prediction of Environmental Emergency Dose Information(SPEEDI), but the SPEEDI was not being operated in the same way as established in the law and in associated guidelines. If one looks at the texts of our laws and/or guidelines, special clauses do exist to take into account special cases where there are difficulties in determining the source of radiation emissions. But such procedures were not taken, and the results that came out of the SPEEDI system were not utilized properly even though they were available at hand. Furthermore, the SPEEDI is working in a such a way so as to estimate promptly how much radiation exposure the public might be getting, but the results were not released immediately.

Equivalent doses caused by radiation exposure of the thyroid that are based on data related to the submersion of the initial plume, especially those of children, should be made available to the public immediately without hiding anything, and the areas that should be covered here are not just vicinities of 20-30km spheres, but also the whole of Fukushima, Ibaragi, Tochigi and Gunma prefectures, as well as all other areas of Kanto and Tohoku. Furthermore, data from WSPEEDI system (the one which covers much wider spheres of several ten kilometers to several thousand kilometers) should not be hidden at all. It needs to be released to the public, covering equivalent as well as effective doses to the thyroid for the residents not only of Fukushima, Ibaragi, Tochigi and Gunma prefectures, but also of all other areas of Kanto and Tohoku.

I would like to note that judgments and directions made at Office of Radiation Regulation of the Ministry of Education, Culture, Sports, Science and Technology also disregarded legally mandated procedures. For example, the matter regarding the "limit" of emergency radiation exposure for occupationally exposed persons and whether to reflect the 2007 recommendation made by the International Commission on Radiological Protection into our domestic law has already been discussed for several years at the Office of Radiation Regulation. In the end, they stated their final conclusion in their "Interim Report of the Central Committee, Office of Radiation Regulation" at the end of January this year, which recommended setting the limit at either 500mSv or 1Sv.

Naturally, one should stick to this when being asked for an opinion on this matter, that is the lawful procedure, but when Ministers of Economy, Trade and Industry or of Education, Culture, Sports, Science and Technology inquired about whether the limit of 250mSv, which appears only in those 40 to 50 year-old-guidelines for locating and building of power plants, could be considered appropriate or not, they, as the Office of Radiation Regulation, answered that it was appropriate. However, reflecting the severe situation at Fukushima, they have started to discuss whether to increase the limit to 500mSv. To me, this can only be described as a "whack-a-mole" sort of attitude or a process of policy making in a very short-sighted manner, by the cabinet and administrative authorities.

This administrative disregard of the decisions made at the Office of Radiation Regulation needs to be thoroughly explored. This way of hastily discussing the matter via email and then making forceful conclusions, as well as the whole reasoning behind setting up to 500mSv as acceptable exposure, I find to be tremendously dubious. In addition to that, when you have a very important matter such as this, which has been a subject of discussion for many years, I do not think it can be judged "appropriate" if it is in a completely different context.

As for the names of who decided or participated in this kind of procedure which completely disregarded the previous decisions made at the Office of Radiation Regulation, they should be released openly to the public. I strongly advise this.

2. We need to stick to international common sense and humanism

At times of emergency, we cannot do without exceptions to standard rules and we are indeed capable of setting them up, but in any case, international common sense ought to be respected. It is wrong to forcibly push through conclusions that happen to be convenient only for the administrative authorities but which are utterly unacceptable by international standards. Such conclusions are bound to draw criticism from the international community.

This time, upon discussing the acceptable level of radiation exposure for playgrounds in primary schools in Fukushima, they have calculated, guided and determined a level of "3.8μSv per hour" on the basis of "20mSv per year". It is completely wrong to use such a standard for schools that are going to run a normal school curriculum, in which case a standard similar to usual radiation protection measurement (1mSv per year, or even in exceptional cases, 5mSv) ought to be applied, and not the one used in cases of exceptional or urgent circumstances (for two to three days, or at the most, one to two weeks). It is not impossible to use a standard, perhaps for a few months, of 10mSv per year at the maximum, if the public is rightly notified of the necessity of taking caution, and also if special measures are to be taken. But normally it is better to avoid such a thing. We have to note that it is very rare even among the occupationally exposed persons (84,000 in total) to be exposed to radiation of 20mSv per year. I cannot possibly accept such a level to be applied to babies, infants and primary school students, not only from my scholarly viewpoint but also from my humanistic beliefs.

You rarely come across a level of 10mSv per year on the covering soil if you measure the leftover soil at a disposal site in any uranium mine (it would be about a few mSv per year at the most), so one needs to have utmost caution when using such a level. Therefore, I strongly protest the decision to use the standard of

20mSv per year for school playgrounds, and ask for revision.

Also, the International Atomic Energy Agency (IAEA) has sent its own investigative team to Japan regarding this nuclear emergency in Fukushima, and they have held four briefing sessions based on their investigations. But information regarding these briefing sessions were not given to the cabinet from the Ministry of Foreign Affairs. I take that as a disregard for international relations and for the IAEA. Also, we needed to strengthen our cooperation with the IAEA from an early stage, regarding the control of measuring nuclear substances, nuclear inspections, and protection of nuclear materials, but at the time when it was needed, the cabinet and administrative authorities were not aware of these matters, and that can be described as a dysfunction of nuclear diplomacy. I strongly demand a restoration of nuclear safety regulation based on a standard of international common sense.

Translated by Tanaka Izumi

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