Japanese civil society requests that the reports of the United Nations Scientific Committee on Fukushima be revised

1. Concern for the reports of the United Nations Scientific Committee

The United Nations Scientific Committee has inserted the results of investigations on the effects of radiation exposure from Fukushima Nuclear Power Plant Number 1 into its report, which will be submitted to the 68th session being held at the moment.

We, the undersigned civil society organizations in Japan express serious concern that the results of these investigations contain some problems in terms of objectivity, independence, and accuracy, and that the underestimation of the effects of radiation exposure could have negative effects on the human rights and protection of citizens.

We request that the United Nations Scientific Committee and the United Nations General Assembly Forth Committee revise the reports from a human rights perspective to protect the most vulnerable people based on careful and sufficient deliberations.

The parts of the reports which include the foremost concerns of Human Rights Now are outlined as follows:

- “The doses to the general public, both those incurred during the first year and estimated for their lifetimes, are generally low or very low. No discernible increased incidence of radiation-related health effects are expected among exposed members of the public or their descendants.” (para. 39)

- “For adults in Fukushima Prefecture, the Committee estimates average lifetime effective doses to be of the order of 10 mSv or less, and first-year doses to be one third to one half of that. While risk models by inference suggest increased cancer risk, cancers induced by radiation are indistinguishable at present from other cancers. Thus, a discernible increase in cancer incidence in this population that could be attributed to radiation exposure from the accident is not expected. An increased risk of thyroid cancer in particular can be inferred for infants and children.” (para. 40)

2. The lack of independent investigation

Firstly, the United Nations Scientific Committee has never officially visited Fukushima prefecture to investigate after the Fukushima nuclear accident. The estimate by the committee of health effects, contamination, and the radiation exposure of workers at the nuclear plant from radioactive substances are based only on data given by the Japanese Government and Fukushima prefecture.

Japanese civil society and various experts have proceeded with independent investigations and tests which show different results from those of the government and Fukushima prefecture, but there is no evidence that the committee has considered this independent data or carried out its own investigations. Hence, the investigation which
has been conducted by the committee is not independent from the Japanese government.

Fukushima prefecture has conducted research on the early effects of radiation exposure for all people who lived in Fukushima at the time of the accident, but the response rate was only about 20%. Therefore it's impossible to speculate on the effects of early radiation exposure based on such limited data. Also, the citizens in Fukushima have strongly criticized the radiation data released by the government on the grounds that it does not reflect the actual conditions. Mr. Anand Grover, the United Nations Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health, also notes that there is a discrepancy between the results of monitoring posts and the actual radiation dose, after conducting a field survey himself. (A/HRC/23/41/Add.3)

As the current issue relating to contaminated water indicates, there are serious problems in attitude of the Japanese government in publicizing information, and thus it can hardly be said that the transparency of information is ensured. Human Rights Now requests that the United Nations Scientific Committee and the United Nations General Assembly Forth Committee collect their own independent investigation results, including field investigations, before approving or publicizing such reports.

3. The conclusion of the Committee lacks accuracy

[1]. The United Nations Scientific Committee has concluded that ‘the doses to the general public, both those incurred during the first year and those estimated for lifetime exposure, are generally low or very low.’ and ‘for adults in Fukushima Prefecture, the Committee estimates average lifetime effective doses to be of the order of 10 mSv or less, and first-year doses to be one third to one half of that.’

However, the Japanese government has not instructed people in areas in which the annual external dose is under 20mSv to evacuate, and substantial number of people who live there has been exposed to external doses which accumulate to over 10mSv per year since the accident. Although the Committee has not indicated which evidence they have referred to, it is highly doubtful that this estimate reflects the actual situation.

The conversion of air dose to effective dose lacks credibility and has become controversial within Japan due to the fact that it varies according to the characteristics of the environment being lived in. Also the average number signifies an estimate of the magnitude of effects to the entire group, but the report has concluded that there will be no effects without indicating any estimate of the magnitude of effects. This position excludes the possible effects of high-risk factors of people living in the area much higher than 10mSv her per. This approach is hardly scientific.

[2]. Moreover, while the United Nations Scientific Committee speculates that the risk for thyroid cancer for infants needs to be increased, they do not expect an increase in risks for other kinds of cancer. This contradicts the results of current epidemiological research which indicates health effects of low-level radiation. The Radiation Effects Research Foundation has released results of new LSS reports that collect reports from 1950 to 2003 on the atomic bomb victims in Hiroshima and Nagasaki. This research indicates that the excess relative risk for all solid cancer increases with even low-level doses of radiation.
In research conducted by Cardis on six hundred thousand nuclear plant workers in 15 countries, the death rate of nuclear plant workers who are exposed to an average annual dose of 2mSv radiation is high.

The International Commission of Non-Ionizing Radiation Protection, including BEIR, supports the linear no-threshold model, which portrays low dose exposure that is 100 mSv or less as a risk to health and does not negate health effects due to low-level radiation exposure.

The collective reports of approximately six hundred and eight thousand young patients who received computed tomographic scanning in Australia showed that leukemia, brain tumors, thyroid cancer and many other cancers have increased, and the infection rate has increased by an average of 1.24 overall. Also, from a case-control study on natural background radiation level exposure, it seems clear that as accumulated gamma-ray exposure increases, the risk of leukemia increases relatively, and if it exceeds 5mGy, the minimum of 95% confident interval exceeds one share and becomes significant. Moreover, with over 10mGy, the risk of cancer excluding leukemia also rises.

The United Nation Scientific Committee underestimates the effects due to low-level radiation exposure. The committee should adopt a more cautious approach regarding low-level radiation exposure based on the latest epidemiologic studies.

4. Inconsistency with other views

The United Nations Scientific Committee observes that there is little risk to health by radiation in Fukushima. However, this view differs greatly from the prospects which are included in the reports regarding the nuclear accident in Fukushima by the WHO. According to the reports by the WHO in the two most affected locations of Fukushima prefecture, the preliminary estimated radiation effective doses for the first year ranged from 12 to 25 mSv. In the highest dose location, the estimated additional lifetime risks for the development of leukaemia, breast cancer, thyroid cancer and all solid cancers over baseline rates are likely to represent an upper bound of the risk as methodological options were consciously chosen to avoid underestimation of risks. For leukaemia, the lifetime risks are predicted to increase by up to around 7% over baseline cancer rates in males exposed as infants; for breast cancer, the estimated lifetime risks increase by up to around 6% over baseline rates in females exposed as infants; for all solid cancers, the estimated lifetime risks increase by up to around 4% over baseline rates in females exposed as infants; and for thyroid cancer, the estimated lifetime risk increases by up to around 70% over baseline rates in females exposed as infants.

The WHO also states that even in the area where preliminary estimated radiation effective doses were 3 to 5 mSv, “the increased lifetime estimates for cancer risks over baseline rates were approximately one-quarter to one-third of those for the people in the most affected geographical location”. In addition, the WHO concludes that expansion of scientific understanding of low-level radiation exposure changes the way people think concerning its risks.

Furthermore, the United Nations Scientific Committee introduces the Scientific Finding B. “Effects of Radiation Exposure of Children” together with the effects of the nuclear plant accident in Fukushima in its reports. This shows that further research should be more careful because the effects of radiation exposure of children are unpredictable. This point is remarkable. Nevertheless, such a viewpoint is not reflected in the reports of the United Nations Scientific Committee, and therefore these reports
The reports by Mr. Anand Grover should be reflected and considered

In May 27th 2013, Mr. Anand Grover, the Special Rapporateur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health at the United Nations, submitted a report regarding the human rights situation after the nuclear plant accident in Fukushima based on a field investigation in some areas including Fukushima in November 2011. The report makes detailed recommendations to the Japanese government.

The Special Rapporateur notes carefully the epidemiological studies concerning
health effects of low level radiation exposure and states that the government should take
the position of protecting the most vulnerable people, such as pregnant women and
children, as long as negative health effects cannot be denied to them. He also observed
that the Japanese government should “formulate a national plan on evacuation zones
and dose limits of radiation by using current scientific evidence, based on human rights
rather than on a risk-benefit analysis, and reduce the radiation dose to less than
1mSv/year.”(para.78(a)) Moreover, it is said that “evacuees should be recommended to
return only when the radiation dose has been reduced as far as possible and to levels
below 1 mSv/year.” (para.49) According to the report, health management surveys and
support to evacuate should be provided to persons residing in all affected areas with
radiation exposure higher than 1 mSv/year.

Japanese civil society has welcomed this report because it seeks measures to
protect the right to health from the point of view of the most affected and vulnerable
people.

However, the Japanese government has refused to implement most of the
recommendations in the report because it is not scientific enough. The underestimation
of effects of low level radiation exposure by the United Nations Scientific Committee
leads to a negative consequence on policies to protect the right to health and provide
relief to victims. This is inconsistent with the aims of United Nations.

The United Nations Scientific Committee and the General Assembly should
make decisions taking human rights into greater consideration, and their decision-
making should take into account the report by the Special Rapporteur on the right to
health which considers a human rights perspective.

7. Conclusion

As stated above, we, the civil society, request that the United Nations Scientific
Committee and the United Nations General Assembly Forth Committee revise the
reports of the United Nations Scientific Committee from a human rights perspective to
take a more cautious approach with regards to low level radiation exposure to protect
the most vulnerable people based on careful and sufficient deliberations.

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