



Commission de Recherche et d'Information
Indépendante sur la radioactivité
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Valence, July 3, 2015

PARLEMENT EUROPEEN
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**Objet : Vote of the European Parliament / Maximum Permitted Levels
of radioactive contamination of food and feed after a nuclear accident**

Distinguished MEPs,

On July 9, you have to vote on amendments to the proposition of regulation laying down Maximum Permitted Levels (MPLs) of radioactive contamination of food after a nuclear accident. Radioactive products are carcinogenic and mutagenic substances for which there is no safety threshold. Hence, the regulation is to determine the concentrations of toxic products that will be allowed in the diet of more than 500 million Europeans, including tens of millions of children.

Summary of the last months:

1. In the introduction to the draft regulation, the **explanatory memorandum** (point 10) states that the **validity** of the MPLs has been established by the Euratom Group of Experts in its opinion of 11/21/2012 confirming its conclusions of 1998 : [publication Radiation Protection 105](#).
2. Our own calculations show that the application of these levels can expose consumers to much higher doses than the effective dose limit and to unacceptable levels of risk. To understand this discrepancy, we conducted a critical analysis of the Euratom Experts' report.
3. Through this audit work, we identified **about fifteen very serious anomalies, all of which have the effect of underestimating the levels of dose and of risk!** This leads to validate much too high levels of radioactive contamination in food. You will find the main mistakes, shortcomings, irregularities and inconsistencies in [the 4 pages synthesis \(en français ; in italiano ; en español\)](#).
4. Given the seriousness of these findings, we asked the European Commission the **names and professional references** of the authors of the 1998 report (and of the 2012 opinion that confirms its conclusions without reservation). The General Directorate of Energy has denied us these data on the grounds that this transmission could "undermine the legitimate interests" of the experts involved (in French : the mail from the [DG ENER](#) and our argued [response](#)). Judged admissible, the [complaint](#) we lodged against the Commission is being investigated by the Euro-Ombudsman.
5. **We expected that the review of the project by the European Parliament would highlight these serious anomalies. The least we can say is that we were disappointed:** 1/ During the presentation at the ENVI committee, the rapporteur said he did not call into question the MPLs of radioactive contamination, inviting his colleagues to "be humble" and to "trust the experts". Deciding to exclude the MPLs from the study, the rapporteur chose to overlook the key element of the draft regulation! (read our mail to [Mme Herranz-Garcia](#)) ; 2/ We had given our approval to participate in an adversarial debate with the experts of the Commission but no meeting has been organized; the technical meeting to allow the ENVI Committee to seek clarification could not be held, the Euratom experts being unavailable!

The Commission's draft regulation is not easy to amend: it is full of too many contradictions, too many gaps. **A full rewriting is necessary**, based on sound scientific basis and a transparent, pluralist and democratic procedure (see [the petition](#)). **However, it is very important that Parliament use the vote on 9 July to send a strong and unambiguous message to the European Commission and the Council of the European Union which will decide the matter in the coming months.**

We urge you to support the amendments that address the Annexes 1 and 2 of the draft regulation. These annexes set the maximum permitted levels of radioactive contamination in food:

- **Please vote in favour of the amendment which divides by 10 the limits defined in Appendix 1. This reduction is not sufficient but it is designed to correct one of the major inconsistencies of the proposal:** The experts have indeed considered that **only 10%** of food would be contaminated in the event of a major nuclear accident but, according to their own writings, this percentage is designed for accidents similar to Chernobyl's in nature and distance from Europe.¹ The problem is that the scope of application of the regulation is not restricted to distant accidents, it also include accidents occurring **within the borders** of the Union. **If you refrain from voting this amendment or if you vote against it, you will accept that limits dimensioned to an accident at more than 1 000 km from Europe's borders are applied to an accident at the heart of Europe! The consequences of your decision will affect more than 500 million consumers.**
- **This amendment also corrects a false and extremely dangerous statement on levels of radioactive contamination allowed in drinking water** ². The regulation asserts that the limits of the category "liquid food" apply to drinking water since they were calculated for a "current consumption" of drinking water. This is totally untrue: the limits are calculated for a daily consumption of **16 ml** of contaminated water for an adult and of **7 ml** for an infant (one or two sips of water a day!!!). Usual drinking water consumption is 100 times greater! **The limits laid down in Annex 1 shall in no case be applied to drinking water! If you refrain from voting the amendment or if you vote against it, you will strengthen misinformation and contribute to exposing the people of Europe to intolerable risk levels.**
- **Please vote in favour of the amendment to Annex 2 which removes the category "minor food" and the excessively high limits assigned to them. Experts have indeed forgotten to take these foods into account in their calculations!!!** When one authorizes contamination levels 10 times higher than those laid down for basic foods, the least they could do would be to assess the associated doses. Using the EFSA consumption data, we performed these verifications and found significant exceedances of the limit of 1 mSv/year with only the consumption of spices and condiments.

Moreover, the consumption of 135 grams of sweet potatoes (contaminated by iodine 131 at the level authorized by the proposed regulation) would deliver to a 1 year old child **a dose so high that it would necessitate the administration of stable iodine tablets** in order to protect their thyroid from radio-induced cancer! And 135 g represent the consumption of only one day! How to allow such an aberration?



If you refrain from voting the amendment or if you vote against it, you will support limits lacking of any scientific basis and leading to unacceptable levels of risk. Remember that Chernobyl has caused a massive increase in thyroid cancers, especially among people exposed at very young age.

An issue likely to impact the health of 500 million Europeans should transcend the logic of parties and we expect a massive vote in favour of these amendments. We heard that the vote will be by roll call. The tens of thousands of citizens who are already mobilized on this matter will closely follow the vote of their representatives. We count on your presence and your commitment to serving the public interest and to the preservation of public health.

¹ Extract from the Euratom experts report (radiation protection 105, page 6): «*Experience in the EU subsequent to the Chernobyl accident suggests that a value of 0.1 is appropriate for accidents occurring under similar conditions as regard type and distance from an affected area*».

² Text of the proposal of regulation of the Commission: "**The values are calculated considering the current water consumption and the same values should be applied to drinking water.**" This sentence should be amended as follows: "**The values are calculated for 1% of the consumption of drinking water and the Member States must apply limits 100 times lower to drinking water supply**" (NB: if the limits defined for the "liquid food" are already divided by 10, the necessary reduction is only of a 10 factor).

The Convention on the Rights of the Child states that *“the child, by reason of his physical and mental immaturity, needs special safeguards and care, including appropriate legal protection, before as well as after birth”*. The draft regulation constitutes a serious breach of this commitment. The calculations we have conducted show that **50% of cancers** induced by the consumption of contaminated food (but within the limits) would be initiated in the body of children while they represent **only 15% of the total population!** And the project doesn't provide any protection for pregnant women (while the radio-sensitivity of the **foetus** has been widely demonstrated) nor for women who are breastfeeding (while radioactive iodine pass easily into breast milk and the **infants** are the most vulnerable age group).

We are entirely at your disposal should you require further clarification or information.
Yours faithfully,

For the President of CRIIRAD,
Corinne CASTANIER
Responsible for Radiation Protection issues

