

Article 31 Group of Experts

Meeting on 8-9 June, opinion related to the accident in Fukushima

Measures with regard to containers and conveyances, and goods (other than food, feed, cosmetics or medicinal products) imported into the EU after the accident in Fukushima

1. Containers and conveyances

The Experts are of the opinion that the criterion offered in the Commission's ECURIE information message on 15 April 2011 (0.2 $\mu\text{Sv/h}$, above background, by default at a distance of 1 m) had been a good basis for the screening of ships and containers entering European harbours and to harmonise the controls. In the light of the experience with ships and cargo from Japan that have entered EU ports, showing only in few cases very low levels of contamination, and in view of the commitment by Japan to monitor ships leaving the main harbours, it is appropriate to maintain this screening tool, bearing in mind that some ships may take a much longer time to reach a European harbour.

The Experts note that the international transport regulations could be understood to apply also to ships, airplanes and containers that are not transporting radioactive materials but are contaminated as a result of an accident. The Experts observe however that these regulations are meant on the one hand to prevent "non-fixed" contamination to be spread and on the other hand to avoid external exposure. There seems to be no clear rationale, from a radiation protection point of view, for the transport criteria on surface contamination levels and external radiation levels for their application to conveyances and containers contaminated in the aftermath of a nuclear emergency. The international transport regulations may need to be accompanied by further guidance in this context. Guidance is also needed on the management of, for instance, contaminated ventilation systems.

The Experts underline the importance of the optimisation principle (exposures As Low As Reasonably Achievable), calling for any "non-fixed" surface contamination to be actually removed whenever this is practicable and the decontamination, including its effluents, is either exempted or authorised.

The Experts also underline that the extent of checks for surface contamination, in addition to the screening proposed by the Commission, should be commensurate with the risk and cost involved in monitoring; systematic and comprehensive monitoring does not seem warranted in this case. Guidance is also needed for a better definition of "non-fixed" contamination. The

Experts welcome the initiative of ISO to develop adequate protocols for monitoring methodologies.

2. Goods other than food, feed, or cosmetics

For the definition of surface contamination on goods, the criterion (0.4 Bq/cm² for beta-gamma emitters) laid down in transport regulations would apply.

For the activity concentration per unit mass, the current Basic Safety Standards do not define maximum permitted levels; however, national authorities could impose regulatory control referring to the exemption values laid down in Directive 96/29/Euratom; these exemption values have been revised and generally reduced in the new recast BSS. The Experts note however that the rationale for the exemption criteria is based on a very low dose of 10 µSv/y, which is orders of magnitude below the reference dose that would apply in a post-accidental exposure situation. The Experts invite the EC and IAEA to pursue the establishment of internationally agreed values for use in trade of any goods, applicable whatever is the cause of contamination (normal practice, lost orphan sources or a radiological emergency affecting goods in international trade).

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