

Valence, November 17th, 2017

Mme Zsuzsanna JAKAB WHO Regional office for Europe UN City Marmorvej 51 DK-2100 Copenhagen Ø DANNEMARK

<u>Our references</u> : 2017-11-16_oms_ru-106 Also addressed by E-mail (postmaster@euro.who.int)

Dear Dr JAKAB,

Our laboratory is operating a network for atmospheric radioactivity monitoring located in the South-East of France and we are working on the issue of ruthenium 106 contamination.

As you probably know, several European networks for monitoring of atmospheric radioactivity have detected a ruthenium 106 contamination which, according to the available information, started at the latest 25th September and ended no earlier than mid-October. Authorities of Western and Central Europe have agreed on the absence of any health or environmental risk on their territory. However, according to calculations of the German BfS¹ and the French IRSN², **Southern Urals** is the probable source of ruthenium-106 detected in Europe.

The information published on October 13th 2017 by the IAEA is uncomplete, unreliable and some data are not consistent with the IRSN statements. Most of all, this agency focuses exclusively on the absence of health issues in Western and Central Europe without addressing the risks incurred by the workers of the facility involved and by the population living in the surrounding area.

We are not really surprised as this is not the first time this agency tries to minimize the impact of a nuclear accident. Because of its statutory mission to develop civilian nuclear energy, the protection of human health is not its core priority

However, the health protection of population is the fundamental mission of WHO and we do not understand the absence of any intervention or statement from this major organization. We don't understand the complete silence of the Regional Office of Europe whose responsibility covers the two countries considered by the official experts to be the most probable location of the release: Kazhakstan and more likely the Russian Federation.

Given the importance of the ruthenium 106 release, this is not a trivial accident. The results of simulations carried out by several official expertise organizations suggest that the accident could be classified at level 5 of the International Nuclear and Radiological Event Scale. As you know, the INES level 4 is reserved to nuclear accident with local consequences that don't require the implementation of countermeasures other than the control of local food production. Based on its simulations, IRSN considers that protective measures such as confinement or evacuation were mandatory within a 5 km radius around the release point. These estimates are all the more worrying as the dose levels chosen by the radioprotection authorities for triggering these protective measures are extremely high.

¹ Federal Office for Radiation Protection/ Bundesamt fürStrahlenschutz.

² Institut de Radioprotection et de Sûreté Nucléaire

Moreover, foodstuff control could be required up to 40 km away from the emission point : in this zone, according to IRSN, the surface activities would be between 60,000 and 100,000 Bq/m² and therefore likely to cause the UE maximum permitted levels of radioactive contamination in food to be exceeded. Once again, this finding is all the more serious as CRIIRAD has demonstrated that these limits have been established on an erroneous basis and exposes the consumers at a much higher risk than the regulation is supposed to guarantee. We remind you in this regard that the European maximum permitted levels are well above the limits set by the Codex Alimentarius.

Therefore, it was crucial right from the beginning to ensure the protection of all the exposed population. As you know, in case of atmospheric contamination, a rapid response is critical. It was WHO's responsibility to make every possible effort to ensure that the responsible authorities were aware of the risks and to make sure that appropriate protective measures would be taken.

It is now too late to effectively protect the exposed population but there is still time to limit exposures. Moreover, it is imperative to understand what happened. Either the facility responsible for the radioactive release was aware of it and one can hope (but nothing is guaranteed) that site workers and local population protection measures have been taken, even if a blackout on information was imposed; or it was not aware of the accident, which means that no protective measures have been implemented.

CRIIRAD demands that everything is properly made to identify the source of the pollution and provide the workers and affected populations with all the necessary assistance. In addition, it is imperative that all lessons be learned so that such a situation does not happen again. Solidarity and responsibility have to replace inaction and indifference.

We remain at your disposal for any clarification and hope for a fast response,

With our best regards,

For the President of CRIIRAD, Roland DESBORDES Corinne CASTANIER, in charge of Radioprotection Questions

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Attachment : CRIIRAD's letter to the IAEA