

**General comments on the Draft report of the High Level Expert Group on European Low Dose Risk Research prepared on behalf of ENISS**

Reviewer: Prof. Synnöve Sundell-Bergman, Vattenfall AB  
[synnove.bergman@vattenfall.com](mailto:synnove.bergman@vattenfall.com)

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An initiative of Euratom to launch a programme called MELODI (Multidisciplinary European Low Dose Initiative) in order to strengthen the EU research on low doses has been proposed by the High Level Expert Group (HLEG) under the responsibility of the European Commission. The group stresses that such initiatives have been recognised by the US (DOE) and Japan, who already have large programmes in this area. Also, within the EU member states, considerable research activities are ongoing and the MELODI aims to e.g. bring these programmes together, to establish effective interfaces with stakeholders as well as to establish an integrated approach for training and education.

The advantage of these objectives, as well as establishing larger research groups to study complicated scientific matters, like e. g. the mechanisms underlying the LNT hypothesis, for both scientific and financial reasons, is recognised. However, that should not preclude national research efforts *per se* undertaken with similar objectives, and, in particular, the implications for these activities, when issuing the suggested overarching programme at the European level, need to be better addressed. Evidently, there are disadvantages creating larger constellations for research purposes, above all concerning the increased bureaucracy and the extended administration.

In our opinion, the initiative to strengthen research on low doses within EU member states is important and of great value for the nuclear industry. The key topics for future research concerning radiation protection and risk assessment that are highlighted in the report are undoubtedly essential to increase knowledge about low dose risks. Also, the need of key competences in radiation sciences and the necessity to attract young scientists are challenges of paramount importance.

The description of the scientific background is informative, although the conceptual illustration of indicative research directions for the time period does not seem to diverge much from today's priorities. It appears that scientific experts within Europe have provided input on especially these matters but have not been directly involved in suggesting the strategic MELODI programme, which is the major task of the HLEG.

Compared to the scientific part of the report, the description of the multidisciplinary European low dose initiative (MELODI) is very vague and raises several

questions. Of utmost importance is to clarify the tentative organisation and especially to outline the composition of the proposed Governing board and Executive Committee and how and by whom they will be elected. In the document it is only stated that operational management should be based on the existing arrangements, but it is unclear what is meant by that. A scientific council ought to have major impact on the research agenda but is lacking in the organisational chart given in the report. In this respect it is also difficult to understand after what principles and by whom the projects will be approved. These matters should be made clear in view of objectivity and transparency before launching the programme.

The budgetary aspects on the MELODI programme have to be revealed, especially regarding how the funding will be allocated. The claims for more significant contribution from the industry to low dose risk research funding, as stated in the report, have to be further explained and, in this respect, compared with today's situation in the various countries. The aim of the proposed "dialogue" with stakeholders also indicates a need for increasing financial support from the industry for low dose risk research in the MELODI programme. The justification of such dialogues (proposals) has to be stated in view of national obligations for all the anticipated stakeholders. In addition, it seems credible that any request for increased financial support for promoting low dose risk research within the MELODI programme has to include some kind of benefit or influence for all the respective stakeholders.

It should be emphasised that for the identified policy questions, authorities and industry are both stakeholders. Besides, in some European countries, the radiation protection authorities perform limited or no research and are dependent on research activities that are carried out at independent universities. This independency is a requirement for critical evaluation on various aspects in the radiation protection field and has to be maintained, especially regarding the issue on high level waste disposal and for the interpretation of various epidemiological results.

We can easily agree on key policy issues and directions on future research as stated by the HLEG, but how the proposed trans-national MELODI structure will function to resolve the problems is not obvious from the information given in the report. Moreover, there is much redundancy in the text about the means to achieve an integrated approach and the governance structure but for those that are not directly involved in the process but dependent on the outcome, more detailed information has to be provided, especially with regard to principles and responsibilities. It must be remembered that MELODI (for radiation protection research) most probably will obtain most of the funds that Euratom plans to give to this type of research, through creation of a Network of Excellence. That may also apply to the anticipated educational and training programme. However, national expertise in countries outside the MELODI sphere is also required but the support may be weakened when focusing too strongly on the MELODI programme within

Euratom. To be consistent, this fact should be taken into account by the HLEG in the future process.

It is possible that the outcome of the planned research to a large extent will influence the radiation protection system in future. Thus questions of transparency and objectivity become increasingly important. Such issues are not yet addressed by the HLEG but need to be better defined within the proposed structure.

Nevertheless, the opportunity to provide comments on the MELODI approach is valuable and hopefully will they be taken into consideration and included in the final form of the programme that will be delivered to Euratom in the end.