

The Comments from Finland to CCE-FU are as follows:

The Commission Services has requested a consultation from the CCE-FU on the "Low Dose Risk Research" Draft Report that was produced by a High Level and Experts Group (HLEG), to which the European Commission is a member.

Finland has had an active role in the preparation of the HLEG draft report on Low Dose Risk. STUK-Radiation and Nuclear Safety Authority is among the leading research organizations on radiation safety research in Europe, and has previously contributed to the low dose research strategy at the global level via the OECD/NEA activities (EGIS, Expert Group on the Implications of Radiation Protection Science). STUK is currently coordinating an Integrated Project on low dose risk in the Euratom programme (NOTE, Non-targeted effects of ionising radiation).

Finland shares the view of the HLEG on the need to strengthen research on low dose risk and to maintain expertise in risk assessment. This is a prerequisite for the sustainable use and further development of nuclear energy, both fusion and fission. The exposure of workers, and to a smaller extent of the public, to low levels of radiation from nuclear energy production and other industrial uses of ionising radiation have become an integral part of the industrialised society. These uses are heavily regulated. Radiation protection standards rely on current knowledge of the risks from radiation exposure. Although much is known about the quantitative effects of exposure to ionising radiation, considerable uncertainties and divergent views remain about the health effects at low doses. Any over-, or under-, estimation of these risks could lead either to unnecessary restriction or to a lower level of health protection than intended.

The HLEG reports provides a summary of the current state of research, the research needs and proposes a way forward. The HLEG strategy spans over several decades. However, HLEG does not specifically address the radiation safety research needs for fusion energy. The radiation safety aspects of the new types of nuclear energy generation, such as fusion and Generation 4 reactors should be properly reviewed and taken into account in the HLEG strategy. In particular, there is less knowledge on the risks of internal emitters as compared to external radiation. Tritium is an important issue and there has been controversy on its relative biological effectiveness. To carry out research on internal emitters, it is necessary to maintain critical infrastructures, such as animal facilities capable of handling of radionuclides. This requires coordination actions on the European and international level. It is also possible that some radioactive nuclides are produced in fusion reactors that are not so common in fission reactors, and the risks related to these are not yet fully recognized.

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