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Richard Bramhall
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[BY EMAIL]

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Dear Richard & Pete,

Thank you for your comprehensive paper of the debate on radiation and health and oral update at the recent NGO forum meeting. You have suggested that a new process is required in order to interrogate specific topics of interest highlighted in your paper.

As you noted, considerable attention has already been devoted to these topics over the course of many years. As a result, the areas of uncertainty are very well documented. There is now a high degree of consensus among UK and international experts about how to account for uncertainty in the context of radiological protection, namely through the use of conservative assumptions and precautionary approaches. The government is advised on these matters by experts at the Centre for Environmental, Radiation and Chemical Hazards at Public Health England. I am assured that the level of theoretical risk tolerated by current radiation standards in the UK, which are based on advice from PHE, is very low indeed.

This position also appears to be strongly supported by observations. Reports of a potential association between cancer incidence and nuclear plants were investigated by the enquiry by Sir Douglas Black resulting in the establishment in 1985 of the Committee on Medical Aspects of Radiation in the Environment to provide ongoing scrutiny. Since then COMARE has repeatedly interrogated the potential association between leukaemia and other cancers, in particular in the vicinity of Sellafield and Dounray. Successive reports have failed to find any meaningful association, although work continues to monitor and review the evidence over the long-term.


Notwithstanding the relatively high degree of expert consensus in this area it is important that the science is open to scrutiny and challenge. This is why I and my predecessor as ministerial co-chair of the forum, Charles Hendry, both emphasised our support for facilitating dialogue between official experts and those representing alternative positions.

What is not clear to me is that this purpose would be well served by the establishment of a new independent fact finding mission. Robust mechanisms already exist to provide objective advice and independent scrutiny which I believe the proposed new mission

would duplicate. Instead of seeking to establish new mechanisms I believe DECC should continue to facilitate dialogue among key interested parties, and would like to suggest the following as opportunities you may wish to consider:

- Firstly, I have written to the chair of COMARE to request an update on work completed since its 9th report in 2004 responding to the findings of CERRIE including recommendations for how to priorities future research efforts on radiation and health. My hope is that this will provide you with a helpful update on progress that has been made in the intervening period and provide a focus for future dialogue.
- I am also informed that COMARE confirmed in its plenary meeting last week that its 17th Report, which will revisit the longitudinal Sellafield and Dounray cohort studies and related evidence on cancer incidence and nuclear power, is on track for publication in the summer. I hope that this will provide a valuable contribution towards tackling residual uncertainty on at least some of the topics of interest.
- Separately, an independent review of the evidence base on radiation and health is currently being undertaken by a team based at Oxford University. I understand the purpose of this study is to produce a 'restatement' on the risks of radiation to human health. There have been two such 'restatements' in the past, on the link between badgers and bovine tuberculosis, and on the link between neonicotinoids and pollinators, both were published in the Proceedings of the Royal Society. Although the study is independent of government, my officials have taken the liberty of contacting the team to convey the concerns raised in the NGO forum. The team have agreed that it is important for representatives of the forum to be involved as stakeholders and will be in touch in due course.
- Finally, as you are aware, the EU Member States adopted in 2014 a revised Directive on standards for radiological protection (the 'Basic Safety Standards Directive'). A cross-government programme of work is now underway to ensure that all corresponding UK legislation is reviewed and updated by the implementation deadline of February 2018. I expect work to review the radioactive substances regulations (which now exist as Schedule 23 of the Environmental Permitting Regulations 2011) will be of particular interest. My officials are currently working up plans to invite practitioners and other key stakeholders, including representatives of the NGO forum, with an opportunity to engage on the issues raised by the revised directive early in the process in a workshop format. This will help inform the preparation of a formal consultation paper. Currently 10 September has been pencilled in as a possible date for this and once confirmed officials will be in touch to invite your participation on behalf of the forum.

I hope this update is helpful.

Kindest regards


BARONESS VERMA