

Yukiya Amano
Director General
International Atomic Energy Agency (IAEA)
Vienna International Centre
P.O. Box 100A-1400
Vienna, Austria

14 September 2015

Dear Secretary General Amano,

As citizen groups working on the many issues and major consequences that have arisen from the March 2011 Fukushima Daiichi accident, we are deeply concerned by the recently released International Atomic Energy Agency Fukushima Report. Far from being “an authoritative, factual and balanced assessment, addressing the causes and consequences of the accident, as well as lessons learned”, the report instead reflects the interests of the nuclear industry, which the IAEA is under charter to promote. As this report makes clear, the IAEA has been actively pursuing that mandate in the wake of the Fukushima accident, supporting the pro-nuclear policies of the current Japanese government. Specifically, as a result of the agency’s downplaying of both current and future environmental and human health impacts, this report supports the Abe government’s policy of de facto forced return via cutting compensation for thousands of Fukushima nuclear evacuees. Radiation levels in these areas remain unsafe, even after decontamination, and their repopulation serves only to attempt to normalize a nuclear disaster and reduce citizen opposition to the early restart of nuclear power plants.

Though there are many concerning issues in the IAEA Fukushima report, areas in which we have particular criticism include:

Radiation dose and risks to human health: The IAEA Report confirms that there is a significant amount of uncertainty regarding radiation dose estimates to the affected population in Fukushima. Yet, the IAEA Report concludes that it expects no discernible radiation related effects on human health. This conclusion is scientifically flawed; not only because the estimated dose to the population is uncertain, but also because the estimated collective dose is still significant.

The IAEA report adopts a complacent approach to the scale of contamination in Fukushima prefecture, and utterly ignores the failure of the current Japanese government in its decontamination efforts. The IAEA acknowledges the importance of 'stakeholder involvement' but fails to realize the complete lack of this important aspect of decision-making in Fukushima prefecture. In contrast, people are effectively being forced to return to contaminated land as a result of deliberate Japanese government policy.

Further, the conclusion that there will be no discernible health effects contradicts the historical evidence that the Chernobyl catastrophe provides. In the 5 year Chernobyl report, the IAEA also concluded that there would be no discernible health effects. However, time proved this to be both premature and inaccurate. Thus, the IAEA Fukushima Report's conclusion on health effects is not only lacking needed data to draw such a conclusion, but is likely very premature as it is based on data from the first four years after the disaster.

Failure of safety risk analysis: The IAEA Report fails in fundamental areas to accurately reflect the consequences for nuclear safety of the Fukushima Daiichi accident. It also provides no evidence that nuclear regulation in Japan, now being overseen by the Nuclear Regulation Authority (NRA), has even begun to learn and implement the lessons of the Fukushima disaster.

In fact, the NRA's recent approval of the Sendai reactors for restart, while ignoring significant outstanding seismic and volcanic risks, as well as deviating from the IAEA's own guidelines in order to do so, would certainly indicate that Japan's nuclear regulator has done everything but learn from the Fukushima nuclear catastrophe.

Despite evidence of seismic impact on the Fukushima nuclear plant, the IAEA Fukushima Report does not even acknowledge the unknowns and uncertainties about the causes of the accident. With much of the critical equipment and piping inside the reactors, relevant to understanding the accident, yet to be inspected, it draws conclusions as to the cause of the accident. Incredibly, the IAEA describes the Fukushima Daiichi plant as having "a conservative approach to earthquake design and construction of NPPs in Japan, resulting in a plant that was provided with sufficient safety margins."

Environmental consequence: The IAEA Report utterly fails to address the magnitude, scope, and complexity of the terrestrial radiological contamination resulting from the Fukushima Daiichi nuclear disaster, and dismisses, without supporting evidence, its impact on non-human biota.

In contrast to the superficial dismissal of radiation impacts on the environment by the IAEA report, scientists actually investigating those impacts have concluded that there are measurable impacts on animal life due to radiation exposure. Further, investigations have documented significant and continuing contamination of the forests in Fukushima. These forests are an enormous stock of radiation, which will continue to pose a threat to both non-human biota and people.

We request that the IAEA:

1. Stop drawing conclusions regarding the causes of the accident, as well as current and future human health and environmental impacts, and from presenting this report as an authoritative or comprehensive and balanced review, when there are major uncertainties, gaps in critical data, appropriate research has not been conducted; and, while those thyroid cancers already discovered cannot be dismissed as unrelated to the accident, history has also shown that the latency period for many health impacts has not yet elapsed and in these next years we may see steadily increasing incidence of thyroid cancers and other health implications, as witnessed by the initial years after Chernobyl.
2. Listen to the voices of victims in order to better understand the impacts of both the disaster and the Japanese government's policy of forced repopulation, which the IAEA report supports. Therefore, we request for IAEA officials to meet with citizens groups and their attorneys, which represent thousands of former residents, who are engaged in legal arbitration to obtain fair compensation so that these citizens do not have to return to the contaminated areas; and, that the IAEA officials also meet with those former residents still living in temporary evacuation housing whose lives have been left in limbo with inadequate compensation to establish a life elsewhere; and, that the IAEA meet with mother's organizations fighting the Japanese government's forced return policy, via stripping of compensation, due to the risk to themselves and their children.

The IAEA has demonstrated, particularly since the Chernobyl disaster nearly 30 years ago, that, due to its statutory mandate promoting the expansion of nuclear power, it is compromised when assessing the health and environmental impacts of major nuclear accidents. Given the ongoing nuclear crisis at Fukushima and the deep public concerns about its impacts, only through the establishment of a truly independent international commission that investigates the radiological consequences of the accident, and can do so without prejudice, will the people of Japan be provided with the authoritative, factual, and balanced assessment that they so justifiably need and deserve.

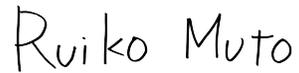
Yours sincerely,



Junichi Sato
Executive Director
Greenpeace Japan



Aileen Mioko Smith
Executive Director
Green Action



Ruiko Moto
Co-Director
Fukushima Action Project



Hideyuki Ban
Secretary General
Citizens' Nuclear Information Center