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NERIS Topical Workshop on Management of Contaminated Goods

Lessons learned from Fukushima by a Member State decision-maker : how to manage a post-accidental situation taking into account scientific and political considerations

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Genesis of the EU regulation

- Precise knowledge of the radionuclides spread all over the globe
- Public sensitivity due to Tchernobyl accident memory
 - Urgent need to put down an adapted regulation to the situation in addition to the national production official control campaign





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Genesis of the EU regulation

- Inadequation between the scope of EU regulation n°3954/87 and the Fukushima nuclear accident
- Differences of food habits between japanese and european consumers
- Need to have a clear and easy-to-follow process for the official controls
 - Implementation of the EU regulation n°297/2011 of 25 march 2011 and immediately (11 april 2011) of a new regulation : 351/2011
 - The « european levels » are replaced by the « japanese levels »





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Basic principles and evolution of the official controls

- New informations on japanese environment contamination
 - Availability of more and more analytical results
 - Better knowledge of the type of radionuclides and their behaviour in the different agricultural productions
 - Growth of the agricultural productions
- Establishment and evolution of a positive list :
- Risk presenting prefectures (systematic pre-export check by the japanese authorities + at least 10% of controls entering the EU)
 - All other prefectures (at least 20% of controls entering the EU)





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Live evolution of the regulation : the example of Shizuoka tea leaves

- June 2011 – French official control at Roissy point of entry : 2 samples of green tea leaves from Shizuoka prefecture are over the regulated level (500 Bq/kg)



Reported analytical results of import controls - Regulation 297/2011 and 961/2011 as amended

Situation 31 December 2011

Reported in the period	Feed and food originating from Japan	Fish from the Pacific region (other than from Japan)	significant findings (i.e. > 10 Bq)	I-131	Cs-134	Cs-137
01/04/2011 and 08/04/2011	40	0	---			
09/04/2011 and 19/04/2011	31	0	---			
20/04/2011 and 02/05/2011	23	4	---			
03/05/2011 and 09/05/2011	13	9	---			
10/05/2011 and 15/05/2011	28	21	---			
16/05/2011 and 24/05/2011	42	30	---			
25/05/2011 and 08/06/2011	38	33	---			
09/06/2011 and 02/07/2011	155	83	3 samples green tea from Shizuoka	<2	485	553
				<4	466	527
				<1	94	108
03/07/2011 and 31/07/2011	101	48	---			
01/08/2011 and 02/09/2011	331	65	5 samples green tea from Shizuoka	<10	30	35
				<3	197	242
				<2	99	118
				<2	58	73
				<2	93	113
03/09/2011 and 30/09/2011	181	22	---			
1/10/2011 and 31/10/2011	162	32	3 samples green tea from Shizuoka	<3	127	157
				<2	105	130
				<2	74	94
01/11/2011 and 30/11/2011	352	34	5 samples (green) tea from Shizuoka	<1	135	153
				<2	84	105
				<3	75	96
				<2	50	64
				<1	71	93
			1 sample dandelion root concentrate from Kanto	<1	32	42
01/12/2011 and 31/12/2011	470	28	1 sample soy sauce from Saitama		110	110
			1 sample of green tea consigned from Tokyo	<1	34	41
TOTAL	1967	409	16 samples (green) tea from Shizuoka 1 sample dandelion root concentrate from Kanto 1 sample soy sauce from Saitama 1 sample of green tea from Tokyo			



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Live evolution of the regulation : the example of Shizuoka tea leaves

- June 2011 – French official control at Roissy point of entry : 2 samples of green tea leaves from Shizuoka prefecture are over the regulated level (500 Bq/kg)
 - Shizuoka prefecture is added to the positive list in the new regulation of 27 september of 2011 : 961/2011
 - difficulties of communication and explanation for the consumer as well as for official inspectors



Live evolution of the regulation : the evolution of the japanese maximum levels

- 01 April 2012 : japanese authorities lower the maximum permitted levels in order to protect the local population.

Food category	Before 01 april 2012	After 01 april 2012
Drinking water	200	10
Milk	200	50
Vegetables, cereals, meat, eggs, fish	500	-
Baby-food	-	100
Other food categories	-	50

Japanese maximum levels evolution in 2012 (Bq/kg)





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Live evolution of the regulation : the evolution of the japanese maximum levels

- 01 April 2012 : japanese authorities lower the maximum levels authorised in order to protect the local population.
 - To keep having an easy official control process, the EU Commission proposes to adopt the same new levels in the EU regulation
 - IRSN (French public expert in nuclear and radiological risks) gives to national authorities another advice :
 - No need to protect more the european consumer by lowering the import maximum permitted levels
 - Risk of a jurisprudence
- Political and safety arguments in balance





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Conclusion

- Maximum permitted levels are the bottom-line of every post nuclear accident regulation :
 - Import-export possibilities
 - Health protection
 - Economic impacts
- The key is the readability
 - For the regulator
 - For the consumer





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Thank you for your attention

