COMMITTEE ON THE MEDICAL ASPECTS OF RADIATION IN THE ENVIRONMENT

120th meeting, Tuesday 3rd July 2018
Skipton House, London

Present

Chairman: Dr Chris Gibson

Members:
Dr Paul Darragh
Dr Frank de Vocht
Professor John Harrison
Professor Brenda Howard
Dr Ray Kemp
Dr Colin Martin
Professor Stephanie McKeown
Dr Tom Nunan
Professor Paul Pharoah
Ms Helen Warner

Assessors:
BEIS
DoH NI
EA
FSA
HSE
NDA
NHS Scotland - ISD
PHE
SEPA
SG
WG

Secretariat:
Dr Simon Mann (PHE)
Dr Emma Petty (PHE)
OPENING ANNOUNCEMENTS

The Chairman opened the 120th meeting and welcomed members. He advised members of the private nature of the meeting and that papers should remain confidential. Members were asked to declare any interests during the meeting.

The Chairman advised members that DH is now the Department of Health and Social Care (DHSC). He informed members that the change from Department of Health to the Department of Health and Social Care in January, reflected the evolving Government priorities, in recognition of the significant challenges faced in providing a sustainable social care system which meets the long-term care needs of an ageing population. The implications of the change in terms of COMARE will be negligible. The committee serves the needs of Government across several departments and there is no intention to change the remit or terms of reference for the committee.

The Chairman noted that this would have been Professor Kevin Prise’s last meeting, but he has sent his apologies. He asked for thanks to be minuted for Professor Prise’s contribution to the work of the committee.

The Chairman welcomed one of the new BEIS assessors to the meeting. He also welcomed a new member of the EA team and also the substitute assessor for HSE.

Apologies

Apologies were received from Dr Jane Barratt, Professor Kevin Prise, Dr Peter Riley, Dr David Sutton, Professor Roger Taylor and Dr Mireille Toledano. Apologies were also received from the assessors for SG, HSE, ONS, EA, WG, MHCLG, FSS, DforE and DHSC, as well as from Ms Kim Stonell from the secretariat.

The Chairman reminded assessors that substitutes may attend the meeting and thanked those departments that sent substitute assessors for this meeting.

ITEM 1 Minutes of the 119th COMARE meeting

1.1 The minutes were accepted with the two amendments.  

1.2 The Chairman noted that an action from the last meeting was to provide members with papers considering genetic factors and the use of contrast agents. Four papers were circulated for members’ attention. Members discussed the potential methodology and commented that there were some interesting observational studies on potential genetic harm. It was noted that the International Commission on Radiological Protection (ICRP) have a task group looking at genetic susceptibility.

1.3 At the last meeting, PHE was actioned with providing an update on the Cancer Registries, with particular focus on the Childhood Cancer Research Group (CCRG) data and the data from the devolved authorities. The PHE assessor advised members that the legacy registration data (1985 onwards) for England from the National Registry of Childhood Tumours (NRCT), previously maintained by the CCRG, have been integrated into the National Cancer Registration and Analysis Service (NCRAS) Encore database. A copy of the English data for 1971-1984 is also held by NCRAS. Data were only exchanged between the national cancer registries of Scotland, Wales and Northern Ireland until CCRG closed. The complete NRCT database is currently held in the Richard Doll Centenary Archive at the University of Oxford, but difficulties regarding access have meant alternative arrangements are being explored. The PHE assessor confirmed that the historic data are preserved and available for use, and the database is updated regularly for England and occasionally for the UK. The PHE cancer registration and analysis team aims to publish an annual UK report next year, with the 2018 England report being published recently.
Wales has adopted the English cancer registration system, as well as the analysis database. Scotland has recently undergone a review of their cancer registration set-up overall. PHE meet regularly with the other cancer registries as part of the UK & Ireland Association of Cancer Registries, and the annual Performance Indicators were published last week (http://www.ukiacr.org/kpis).

The NI assessor added that NICR collect all the relevant data on childhood cancers. The UK and Ireland association of Cancer registries (UKIACR) is very keen to ensure UK data are available for any study which requests it. These data are up to date and still being added to by each registry, while the historic data are still available. The ISD assessor noted that for Scotland there is a separate system for cancer registrations for children and young persons, which was established in response to the demise of the NCRT database. The Chairman commented that there was a broadly consistent reassurance across England, Northern Ireland, Scotland and Wales.

The Chairman noted that there was also an action on BEIS from the last meeting to confirm what is expected for future interactions between the committee & NGOs. The BEIS assessor informed members that there are no further interactions currently planned between the NGOs and COMARE.

**ITEM 2 Matters arising**

**i. COMARE membership**

2.1 The Chairman advised members that three vacancies were advertised earlier this year: for two nuclear physicists / epidemiologists and one environmental geoscientist. There was concern on the number of applications received and it is recognised that the time given by members is increasingly in demand. Two applicants were successful at interview and were offered positions on the committee – one epidemiologist and one environmental geoscientist. They will join the committee in September, with their first meeting in November.

2.2 The remaining vacancy will be advertised together with Professor Prise’s post. Members discussed the potential expertise for the vacancies. It was agreed that the advert should request a radiobiologist and a generic radiation scientist, ideally with an interest in non-ionising radiation.

   [ACTION: Secretariat]

2.3 The Chairman informed members that the previous MoD assessor for the committee has moved on from his post. The secretariat has been working with DHSC to try to get representation from MoD for COMARE without success. The Chairman will continue to pursue this with DHSC.

   [ACTION: The Chairman]

**ii. COMARE matters**

a. Thyroid Research Proposal

2.4 The Chairman reminded members of the project proposal being considered by DHSC resulting from one of the recommendations of the 17th COMARE report. The secretariat has been advised that the project is due to commence on the 1st October 2018. The Chairman welcomed the news and will await further updates on the project.

b. EMF concerns

2.5 The Chairman informed members that a response was sent in reply to the UK & Commonwealth Action Group’s letter of concerns regarding the growing flux of electromagnetic fields (EMFs) and non-ionising radiation (NIR) in the environment. There has been continued communication from the group with concerns and information for the committee. Members discussed the possible range of information for consideration from a variety of sources and the potential impact on COMARE’s work load. There was agreement that the information reviewed by the committee should be new, important and scientifically sound. It would be made
clear to those wishing to provide information that COMARE only considers information which is in line with its terms of reference.

2.6 The Chairman noted that he was still to discuss with DHSC the suggestion of having a working group for non-ionising radiation issues. It was recognised that there are public concerns in this area and it was felt that the committee should keep a close eye on the scientific literature on this issue. [ACTION: The Chairman]

c. SASHU update

2.7 The Chairman noted that Dr Toledano had sent apologies for the meeting and was not able to present the revised proposal from SAHSU. Dr de Vocht gave an outline of the project to members. The Chairman noted that the updates in the revised proposal took into account the discussions from the previous meeting and commented that the scale of the proposed work in the project was impressive. It brings up to date crucial analyses previously done by COMARE and is consistent with the committee's work programme. The Chairman was grateful to SAHSU for undertaking the work. It was thought that this work may address some of the comments from the NGO forum. The project results will hopefully be published in a peer-reviewed paper. The Chairman confirmed that members were content with the revised proposal and were happy for the work to proceed.

ITEM 3 COMARE - requests for advice:
i. Cancer incidence analysis request

3.1 The Chairman reminded members that SEPA had formally requested that COMARE consider updating its analysis of cancer incidence in the area around Dalgety Bay, in line with Recommendation 5 of the 15th report. ISD (NHS Scotland) had agreed to undertake this update.

3.2 The ISD assessor noted that this was the fourth iteration of the cancer incidence analysis, the first having been carried out in 1994 and published in the British Journal of Cancer. There is public concern regarding the potential cancer risk associated with exposure to radium from aircraft material in contaminated land in the area. Members were informed that Dalgety Bay is a commuter town and is relatively affluent, so the outlined methodology for the analysis takes account of the social status of the local population. It was agreed that the current analysis is timely. The ISD report will be placed in the public domain and it was hoped that COMARE would publish a statement on the report when it is released.

3.3 Members welcomed the draft report and discussed the details of the findings. A number of suggestions were made where more clarity could be introduced into the report or the conclusions strengthened. Members felt that more explanation was required to note the difficulty of including cases who moved out of the area prior to diagnosis. The ISD assessor explained the types of analyses that would be needed for this and the problems with undertaking those types of analyses.

3.4 The SEPA assessor added that SEPA welcomes the study. It was noted that in 2011 particles were found at Dalgety Bay that met the RCL criteria, but that intervention by the MoD prevented the land from being classified. Since 2011 prevention measures have been in place, including signs on the beach, fenced off areas and the Food and Environment Protection Act (FEPA) ban, which have resulted in a change in the habits of beach users and a break in the exposure pathway.

3.5 Members provided specific comments on the report, including hyperlinks that needed to be checked and on reviewing the labelling of the tables and including a note on the power of the study to detect an associated risk. Members discussed what level of reassurance could be given in the report from the analysis and how this was stated. Members also questioned how the people local to Dalgety Bay would be made aware of the report and the results, and were advised that Fife Health Board would cover the communication with the
public. The ISD assessor agreed to consider the comments from members and provide an updated version of the report for the next meeting.

[ACTION: ISD]

3.6 The Chairman was grateful for the work undertaken by ISD and would look at synchronising COMARE’s response with the publication of the report, which would incorporate the comments and conclusions of the committee on the results. The BEIS assessor noted that the report was of interest for BEIS when considering the potential risk at other locations.

[ACTION: The Chairman]

ITEM 4 Working group reports

i. Contaminations Working Group (CWG)

4.1 The Chairman and drew members’ attention the update on particle finds considered by the CWG. He noted that an additional particle had been retrieved from the East Foreshore at Dounreay since the update was circulated. This brings the total number of finds for 2018 to 10 particles on the foreshore and 2 on Sandside Beach.

Sellafield

4.2 The EA assessor reminded members that Sellafield Limited (SL) monitoring programme now runs for the calendar year. To date in 2018, 86 hectares have been monitored from the target of 150 hectares with 89 finds. One particle found on Sellafield Beach in October 2017 triggered the characterisation protocol for further analysis. The Cs-137 activity has been determined at 180 kBq, resulting in a dose of 200 mGy/hr; however, this is below the 300 mGy/hr threshold and no further action is being taken on the particle. In May 2018, a particle was retrieved which measured 105 kBq for Cs-137. Further analysis is being undertaken on this particle.

4.3 PHE is undertaking a review of the public health risk assessment for the use of the beach and consumption of shellfish and a draft proposal has been circulated to the CWG for comment. There are three main differences in the approach to this review from previous undertakings.

4.4 The design of the beach monitoring programme going forward will focus on routine monitoring and sentinel beach monitoring. The intervention and particle characterisation protocol will be reviewed after completion of the risk assessment.

4.5 The Chairman asked if there was any progress on the further development of the Moorside site. The EA assessor replied that work is currently paused. Any future construction work will be factored into the routine monitoring programme in place from 2020. PHE have also been asked to take account of possible future changes in their advice.

Dounreay

4.6 The SEPA assessor reminded members that during 2017 5 particles were found on the Dounreay foreshore and 10 on Sandside beach. Reduced monitoring of the east foreshore in 2017 due to issues with bird nesting have resulted in a request for enhanced monitoring of this area for 2018. Monitoring of the foreshores in 2018 has recovered 10 particles. Six of these were retrieved from the east foreshore. Two particles have been recovered to date from Sandside beach. Enhanced monitoring of the east foreshore will continue in 2018.

4.7 The unusual americium-rich particle with a low caesium content discussed previously has fragmented during SEM imaging. A decision will be made on what additional analysis should be undertaken. Any tests will be checked on inactive material before being used on the sample.
4.8 The Particles Retrieval Advisory Group (PRAG(D)) are reviewing the updated data since 2012, which includes the offshore monitoring and the 2013 storm. The aim is for this work to be finalised in the first quarter of 2019.

_Dalgety Bay_

4.9 The SEPA assessor reminded members that last October consultants for the MoD undertook a geotech analysis at Dalgety Bay to determine the options for tying in the membranes for remediation. The results from the analysis are being reviewed. The presence of particles across the bay justifies the ongoing monthly monitoring and the restrictions placed on the beach, with the signage on the beach and the FEPA ban remaining in place. SEPA continues to periodically carry out check monitoring of the beaches.

4.10 _The Chairman_ noted the public interest in the americium-rich particles at Dounreay. The SEPA assessor noted that the Dounreay site updated the particle table on their website and included the americium levels. This is not new information, but just includes the data recorded during monitoring.

4.11 _The Chairman_ advised members that that Scottish Government have opened a consultation on their guidance on protecting the public from radioactive contamination in land, including the draft revised statutory guidance on the Radioactive Contaminated Land (Scotland) Regulations. The consultation closes on 21st August 2018. The CWG have been asked to provide a response to this consultation. If other members wish to comment on the consultation, they should contact the secretariat for details.

  [ACTION: Members]

4.12 _The Chairman_ reminded members that it had been agreed that BEIS would look at providing the draft guidance for local authorities on the process for declaring contaminated land to the CWG for their next meeting. The BEIS assessor agreed to check if there have been any changes to this.

  [ACTION: BEIS]

ii. _Authorisation Working Group_

4.13 _The Chairman_ advised members that a response was submitted to EA's consultation on a permit change for AWE at the Aldermaston site.

4.14 _The Chairman_ asked about the timings on consultations, regarding when a decision is made after the consultation closing. The EA assessor advised that a standard 13 week determination period may be used for straightforward consultations. Complicated issues may take longer to complete.

4.15 Members discussed how some of the terminology used in responses to consultations could be interpreted in different ways and it was important that clear language was used as responses may be made publically available.

**ITEM 5 COMARE publications in progress:**

i. _COMARE - Interventional Radiology issues_

5.1 _The Chairman_ informed members that the secretariat was revising the timetable for the project with the subcommittee chair and this would go to the subcommittee. A teleconference is being arranged to discuss the timetable and project plan. It was noted that there are concerns on the progress of this work and the Chairman welcomed the plans. He added that Professor McKeown had agreed to be vice-chair of the subcommittee and her input into the process is welcomed.

  [ACTION: Secretariat]
ITEM 6 COMARE submitted reports:

i. COMARE - DXA scanning issues

6.1 The Chairman informed members that the DXA report was submitted to DHSC on 8th May. There has been a query from DHSC regarding the terminology used in one of the recommendations. The Chairman reminded members that the committee operates under the Code of Practice for Scientific Advisory Committees (CoPSAC), which permits committees to provide independent advice. The Government departments will use that advice as a basis for policy decisions. Members were reminded that the committee can make recommendations, but it is up to the government as to how these are taken forward. It has been suggested that the queried recommendation may go beyond an independent, scientific recommendation. Members were advised of a possible amendment to the wording that may take account of this, without compromising the integrity of the recommendation. The wording of the recommendation was discussed in detail and the committee agreed to replace the original recommendation with the amended wording. The Chairman would take the amendments back to DHSC.

[ACTION: The Chairman]

ITEM 7 Any other business

7.1 The BEIS assessor noted that the guidance to local authorities on procedures for designating land as radioactively contaminated (RCL guidance) was in the final approval stage and should be available in the autumn. Clarification was given that it was non-statutory guidance and could therefore apply to England, Wales, Scotland and Northern Ireland.

7.2 The Chairman reminded members that the next meeting will be held on Thursday 22nd November 2018 at Skipton House. He thanked members for attending and closed the meeting at 12.15pm.