

How to Involve Stakeholders, especially Citizens, in the Revisioning Process of ICRP General Recommendation: An Analysis of ICRP Public Comments

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Conflict of Interests

- None declared.

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Background, Aim, and Method

- The ICRP has initiated a revision process of its 2007 General Recommendation (GR). Despite the 2007 GR (ICRP Publ.103) recommending stakeholder involvement in decision-making, on radiation protection measures, **2007 GR was developed by fourteen ICRP members**. Other ICRP publications are developed in a similar way.
- For the GR, stakeholders include various parties, including industries, radiation workers, regulatory authorities, government, patients, the general public, etc.
- The aim of this study
 - To propose measures to promote **stakeholder involvement in the revision process of GR**.
- Method
 - To achieve this purpose, we analyze the public comments for ICRP recommendations and conduct case studies on the multi-stakeholder process.

Analysis of ICRP Public Comments

- Method: Analysis of ICRP public comments**
- Descriptive statistical analysis was performed using the published ICRP public comment archive (<https://icrp.org/consultations.asp>). For ICRP Publ. 146, we compared the draft with the final version to confirm how comments were reflected in the final version.**
- Results**
- 2007 GR received only 217+295 comments**
- Sixty-one public comments have been conducted since 2005; a total of 1614 comments were posted (average 26.5 comments/publication). The draft of ICRP Publ. 146 (revision of Publ. 109 & 111) received 308 comments, followed by the ICRP 103 2nd and its first draft, which received 217 and 195 comments, respectively. The rest of the publication received around ten comments.
- Publ. 146 received the largest volume of comments. However, comments from the general public are limited.**
- Based on the poster's attribute, the comments are classified into "Comments by Public" and "Non-Public." Among 1614 comments, the general public posted only 336 comments. Comments by the public are also concentrated on ICRP 146, which received 228, followed by the second draft of ICRP 103 and the 1st draft of ICRP 103, which received 52 and 16 comments, respectively.
- Accepting non-English comments and holding public meetings will effectively promote general public involvement.**
- In response to the Japanese citizen group's request, ICRP 146 accepted comments in Japanese, the public comment period was extended, and a public meeting was held, resulting in a relatively large number of comments.
- Although the ICRP146 draft had fundamental criticism, it was published with only superficial revisions. The autocratic development process of the GR should be drastically improved.**
- The comments include fundamental criticism of the draft: "... neglects malpractice by scientists in Date-city that is severe warning of co-expertise," "self-help waivers the responsibility of the nuclear power company and government."

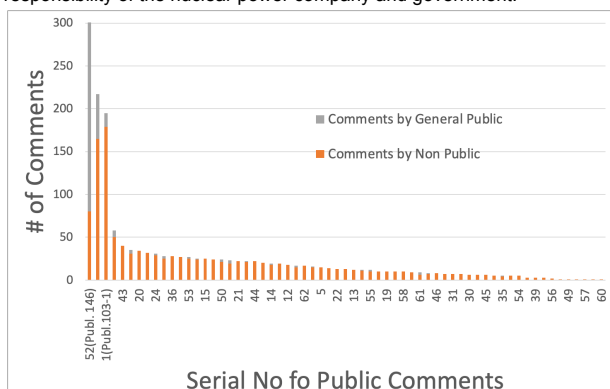


Fig. 1 # of Comments for ICRP public comments

Case Study on ISO's Multi-Stakeholder Process

- Case study on ISO that adopted "multi-stakeholder process"**
- The International Organization for Standardization (ISO), a non-governmental organization with a membership of 169 national standards bodies, adopted a multi-stakeholder approach in developing Guidelines for Organizational Social Responsibility: ISO 26000.
- The working group includes six stakeholder categories and comprises 355 experts and 77 observers.**
- The Working Group on SR is composed of experts and observers nominated by members of the national standardization bodies from six different stakeholder categories: (1) industry, (2) government, (3) labor, (4) consumers, (5) NGOs, and (6) service, support, research, and others (ISO 2017). In 2007, WG comprised 355 experts and 77 observers representing 72 countries (Slob and Oonk 2007, Fig. 2).
- "Twinning" to balance stakeholders power**
- ISO applied "twinning" for WG composition: all leadership positions are shared between a representative from a developed country and a representative from a developing country.
- Representatives from NGOs contributed sufficiently to WG, for example, determining the structure of the guideline.**
- 5200 comments were posted to the second draft.**
- Prior to the Santiago meeting held in 2008, the WG SR had received some 5,200 comments on the second edition of the fourth working draft of the standard (ISO 2023).
- English was a hurdle of communication.**
- However, the voices of developing countries' representatives are not heard sufficiently in plenary meetings due to difficulties with the English language.

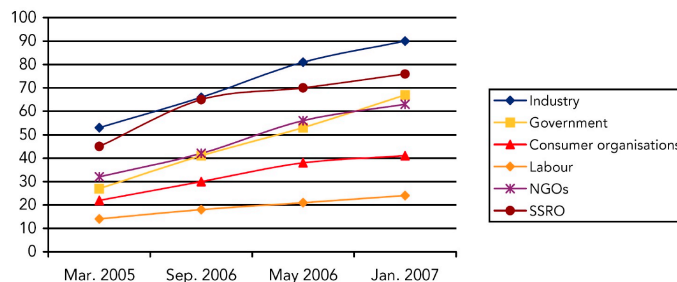


Fig. 2 Stakeholder Participation in the Working Group (Slob and Oonk 2007)

Discussion and Conclusions

- The Autocratic Development Process of ICRP Publications must be democratized.**
- Previous 2007 GR: ICRP Publ. 103 was developed by fourteen committee members of the ICRP or scientists in radiological protection-related fields. Other publications are developed similarly.
- 61 ICRP Public comments received only 26 comments on average. Even though the GR affects various stakeholders, posted comments are around two hundred.
- In the case of ICRP Publ. 146 that accepted Japanese comments attracted a relatively large amount of comments of 386. However, ICRP neglected fundamental criticism and published the final version. That is to say,
- The autocratic development process of ICRP Publications must be democratized to incorporate the general public's interests to protect them.
- A multi-stakeholder process is a solution to democratize the autocratic process.**
- Involving multi-stakeholders, especially the general public or societal group, from the initial stage is a way to democratize the autocratic process, and it fits the "stakeholder involvement" philosophy recommended in the GR and ICRP Publ. 146.
- A twinning-like process must balance the massive power gap between the nuclear industry and the general public. To prevent the undervoice of consumers and NGOs, the twinning process must be employed, and care for non-English participants must be assured.

Reference

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