

2008-01-07 ICRP - The Concept and Use of Reference Animals and Plants

Comments submitted on behalf of SRP: 28th March 2008

1. It is felt that this is a laudable attempt to address an issue when basic data is limited. The document will be welcomed by those involved in environmental impact and assessment work.
2. Radiation protection of the human species is based on the individual. For an environmental situation it is the ecosystem that is more important than the individual species. The document is very much based on a particular species rather than an examination of the habitat or ecosystem. This is the more important ecological concept for protection of the environment. As a consequence much of the document lacks clarity in terms of the key protection objective.
3. The underlying concepts are worthy of acceptance, as the radiation community is uncertain as to the way forward for environmental matters. It is believed that the idea of Derived Consideration Levels is well developed and could be of practical assistance.
4. The concept of a system, similar to that for Reference Man, is reasonable, however as mentioned above it is not certain whether this document has been developed to protect individuals or populations of animals and plants. As a specific example in the case of preservation of a rare species, the document has not addressed whether it should be the individual or the habitat that should be preserved. Para 3 identifies that the objective of environmental protection should be at a population level, but in Para 8 the document discusses Reference Levels to individuals. Thus giving the impression that there is some contradiction. How this has arisen, given in Para 7, is due to difficulties of dealing with populations when there is insufficient data, whereas for individuals in a representative species there is at least limited data.
5. It is unclear as to whether this is a discussion document aimed at identifying where further work is required or a reference document providing guidance to users on the development of environmental standards.
6. Overall it is believed that further work is required to aid clarity before it can be made into a suitable document for use.