

Tokyo Electric Power Company
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Japan

Nuclear Regulation Authority
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August 29, 2017

Dear Tokyo Electric Power Company & Nuclear Regulation Authority,

We are deeply concerned that TEPCO plans to release 777,000 tons of waste containing radioactive tritium into the Pacific Ocean¹. The Fukushima disaster resulted in the loss of human life as well as environmental destruction. This destruction should not be continued. We encourage TEPCO and the Nuclear Regulation Authority not to irresponsibly dispose of radioactive waste in the Pacific Ocean and, instead, find an alternate plan of action for dealing with the waste from the Fukushima disaster.

The time for using world oceans as a dump is over. In the past, communities around the world used the ocean for waste disposal, including the disposal of chemical and industrial wastes, radioactive wastes, trash, munitions, sewage sludge, and contaminated dredged material. Little attention was given to the negative impacts of waste disposal on the marine environment. Even less attention was focused on opportunities to recycle or reuse such materials. Wastes were frequently dumped in coastal and ocean waters based on the assumption that marine waters had an unlimited capacity to mix and disperse wastes.²

However, disposal of wastes and other materials into the ocean degrades marine and natural resources and poses human health risks. Following decades of uncontrolled dumping, some areas of the ocean became demonstrably contaminated with high concentrations of harmful pollutants including heavy metals, inorganic nutrients, and chlorinated petrochemicals. The uncontrolled ocean dumping caused severe depletion of oxygen levels in some ocean waters.³

Countries around the world have been working to stop harmful materials from being dumped into the ocean in an attempt to prevent further adverse impacts to human health, the marine environment, and other legitimate uses of the ocean. The Convention on the Prevention of

¹ The Japan Times, Fukushima's tritiated water to be dumped into sea, Tepco chief says, available at <https://www.japantimes.co.jp/news/2017/07/14/national/science-health/tepcosaysdecisionalready-made-release-radioactive-low-toxic-tritium-sea-fishermen-irate/#.WZxmyJN96Rs>

² Environmental Protection Agency, Learn About Ocean Dumping, available at: <https://www.epa.gov/ocean-dumping/learn-about-ocean-dumping>

³ *Id.*

Marine Pollution by Dumping of Wastes and Other Matter 1972 (The London Convention) is one of the first international agreements for the protection of the marine environment from human activities. The London Convention prohibits ocean dumping of all radioactive wastes and ocean dumping of all other radioactive matter with more than *de minimis* (exempt) levels of radioactivity, as defined by the International Atomic Energy Agency.⁴

Over 80 countries are parties to the London Convention, including Japan. In 1993, Japan, and 36 other nations, voted to permanently bar the dumping of nuclear waste at sea.⁵ As a party to the Convention and a supporter of the initial ban of dumping nuclear waste, Japan should reconsider breaking the promises it has made by dumping tritium into the Pacific Ocean.

The Fukushima disaster, which resulted in the largest accidental release of radiation to the ocean throughout history, has already negatively impacted the Pacific Ocean. Researchers found high levels of cesium, which they noted could accumulate in fish, a concern for both the ocean ecosystem and humans who consume fish.⁶ Ocean currents transported the contaminated waters far in Pacific Ocean, creating a shared burden across the ocean ecosystem.

Instead of adding to the environmental destruction that resulted from the Fukushima disaster, we request TEPCO and the Nuclear Regulation Authority to withdraw their plan to dump wastewater with tritium in the Pacific Ocean.

Sincerely,

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WildEarth Guardians

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⁴ International Maritime Organization, Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter, available at: <http://www.imo.org/en/OurWork/Environment/LCLP/Pages/default.aspx>

⁵ Los Angeles Times, 37 Nations Vote to Ban Nuclear Waste in Oceans, available at: http://articles.latimes.com/1993-11-13/news/mn-56499_1_nuclear-waste

⁶ Woods Hole Oceanographic Institution, Oceanus Magazine, Japan's Triple Disaster: Earthquake and Tsunami led to release of radioisotopes, available at: <http://www.whoi.edu/oceanus/feature/japan-triple-disaster>

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