On “Commentary: The responsibility of the Japanese media, the Fukushima accident and the use of personal data” by T. Sawano et al.¹

Kyo Kageura¹ Yutaka Hamaoka² Shin-ichi Kurokawa³

Jun Makino⁴ Masaki Oshikawa⁵ Yoh Tanimoto⁶

¹ Graduate School of Education, The University of Tokyo

² Faculty of Business and Commerce, Keio University

³ Accelerator Department, Kek, High Energy Accelerator Research Organization

⁴ Department of Planetology, Graduate School of Science, Kobe University

⁵ The Institute for Solid State Physics, The University of Tokyo

⁶ Dipartimento di Matematica, Università di Roma “Tor Vergata”

This Commentary, which alleges the media misportrayal of two papers (now retracted,*1)*2) not only takes a position that ignores the Declaration of Helsinki, which emphasizes the rights and interests of individual research subjects, but also contains the following errors and misleading statements.

1. “The criticism was due to the way in which personal health data were used, ostensibly without obtaining fully informed consent of participants.”

The issue concerned the use of unconsented data, not the use of data “without obtaining fully informed consent of participants.” The data, collected by Date City and used in the papers, contained fields that indicate whether the participants consented or not.

2. “Consequently, media criticism focused on the presumed failure to comply with research ethics guidelines set by Japan’s Ministry of Health and Welfare

¹This is the authors’ original version (AOV) of the correspondence published in *QJM: An International Journal of Medicine* (<https://academic.oup.com/qjmed/advance-article-abstract/doi/10.1093/qjmed/hcab081/6255312>; DOI:<https://doi.org/10.1093/qjmed/hcab081>), and posted here in accordance with the licensing permitted by *QJM*. As this AOV was accepted without modifications, the content is almost identical to the correspondence published in *QJM*, except for minor editorial corrections.

(MHLW).”

Media criticism also focused on the papers’ failure to comply with their own research protocol and on anomalies of scientific content.*3)

3. “The Ethics Committee of Fukushima Medical University reviewed and approved the research, albeit under the strict condition of excluding all participants who had not provided informed consent for their personal data to be used. Date City government officials provided consent forms to all participants, with over 100 refusing to allow their personal data to be used.”

The number of participants who “had not provided informed consent” was 27330, of whom 97 explicitly expressed nonconsent.*4) The Ethics Committee only approved the use of data with explicit consent. The Date City Investigation Reports confirmed this.*4)*5)

4. “according to the privacy law in Japan, disclosing personal records to any third party in order to conduct necessary analysis allowing the municipal administration to fulfill its responsibilities is legally permitted.”

This statement is legally incorrect. Informed consent is required for disclosing personal records; disclosing records without consent is permitted only under extraordinary circumstances, which do not apply to the two papers. The Date City Investigation Reports confirmed that the papers violated the privacy law and the Date City privacy regulations.*4)*5)

5. “They were given freely to the authors of the papers who were outside Radiation Science specialists engaged to help support the management of radiation exposure in Date City ...”

This statement is misleading, as the first author of the two papers was serving as a municipal advisor to Date City on the issue of radiation management.

6. “The Nuclear Regulation Authority of Japan attached a high value to the results of the analysis.”

Multiple anomalies and errors in the numbers and figures of the papers that led to underestimation of the level of radiation exposure have been pointed out.*6 On 8 January 2019, one of the authors, Ryugo Hayano, admitted that the actual life time dose estimate should have been three times the value reported in the papers.

7. “Conflict of interest: None declared.”

The last author of the Commentary co-authored several papers with the authors of the two retracted papers. He also served as an advisor to Minamisoma City and Soma City, both municipalities of Fukushima Prefecture.

References

- *1) Retraction: Individual external dose monitoring of all citizens of Date City by passive dosimeter 5 to 51 months after the Fukushima NPP accident (series): 1. Comparison of individual dose with ambient dose rate monitored by aircraft surveys (2017 J. Radiol. Prot. 37 1). *J Radiol Prot* 2020; 40:908-909.
- *2) Retraction: Individual external dose monitoring of all citizens of Date City by passive dosimeter 5 to 51 months after the Fukushima NPP accident (series): II. Prediction of lifetime additional effective dose and evaluating the effect of decontamination on individual dose (2017 J. Radiol. Prot. 37 623). *J Radiol Prot* 2020; 40:906-907.
- *3) Komiyama R, Oiwa Y. Papers that underestimated the radiation level of citizens: New doubts from experts. *The Asahi Shimbun* 16 Jan 2019. <https://www.asahi.com/articles/ASM1D5VCRM1DULBJ007.html> (Accessed 26 Jan 2021)
- *4) Date City. *Report of the Investigation of the Provision of Date City Radiation Exposure Data*. 2020; <https://www.city.fukushima-date.lg.jp/uploaded/attachment/43948.pdf>
- *5) Date City. *Interim Report of the Followup Committee of the Investigation of the Provision of Date City Radiation Exposure Data*. 2020; <https://www.city.fukushima-date.lg.jp/uploaded/attachment/47306.pdf>
- *6) Kurokawa S, Tanimoto Y, Hamaoka Y, Kageura K, Makino J, Oshikawa M. Comment on “Individual external dose monitoring of all citizens of Date City by passive dosimeter 5 to 51 months after the Fukushima NPP accident (series): II.” arXiv:1812.11453v2 [physics.med-ph] <https://arxiv.org/abs/1812.11453> (Accessed 26 Jan 2021)