

DS475: Arrangements for Public Communication in Preparedness and Response for a Nuclear or Radiological Emergency

(Comments received based on DS475_STEP8_v2.1 dated 25/07/2017)

Version 2 dated 09/02/2018

Country/Org.	COMMENTS RECEIVED				RESOLUTIONS			
	Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
Australia	1.	General		Overall, the draft document meets its objectives with great clarity. However, it may benefit by a review by a public communications specialist to ensure that it will meet contemporary practice in that field, as the majority of public communications issued will go through general channels.	✓			
Canada	2.	General	General comment re: Relevance and usefulness: Are the stated objectives appropriate, and are they met by the draft text?	The stated objective is in general met by the text				
Canada	3.	General	General comment: Scope and completeness: Is the scope appropriate, and is it adequately covered by the draft text?	The stated objective is in general met by the text				
China	4.	General	Suggested adding glossary.				✓	Against established policy that safety standards should be based on terminology in the Nuclear Safety Glossary and not contain individual

								glossaries
China	5.	General	Add an ANNEX about "Radiation emergency public communication programme template".				✓	<u>Against established practice for safety standards. Would instead be elaborated in supporting publications.</u>
China	6.	General	Primary informations and viewpoints, which refer to the main principles, subjects, tools and communication processes, could be charted on the basis of existing text descriptions.	The whole body of the text is written in writing, which is not very helpful for people to grasp the key , especially for people to quickly grasp the main information and key points of the relevant part.				My highlighting!
Finland	7.	General	Edit the whole document to remove unnecessary repetition.	The document contains a lot of unnecessary repetition. The comments below contain specific examples, but there may be more repetition that should be edited out.				
Finland	8.	General		The arrangements that should be developed are within the explanatory and descriptive text, making it hard to get a general overview of all arrangements. Suggest adding a summary table or checklist as appendix that contains all the arrangements discussed in the document.				
Finland	9.	General		The document seems to consider public communication arrangements and planning for nuclear and radiological emergencies as a separate part from crisis communication arrangements for other emergencies. Inclusion of reference to all-hazards approach seems to be missing. This is especially important on the most resource-intensive arrangements (such as telephone hotlines) that may be impossible to set up solely for nuclear and radiological emergencies, but might be possible as part of general national				My highlighting!

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				emergency communication arrangements.				
Finland	10.	General	A section (or similar) where the major terms or concepts would be defined or explained.	<p>This safety guide is a good and extensive guide covering a large variety of topics. However, it would be, for improving clarity, beneficial to have a section or part where the major concepts and terms would be explained or defined. If these explanations and definitions were collected into one place e.g. in the beginning of the guide (or as an annex), it would facilitate the understanding of the guide. Now they are scattered in various footnotes and difficult to find while reading the guide. An explanation of various actors would also make it easier to identify them in the national arrangements.</p> <p>These terms should include at least the following</p> <ol style="list-style-type: none"> 1) All acronyms 2) The various phases of an event, e.g. preparedness phase, emergency phase, transition to recovery etc. 3) The various zones or distances (see at least para 4.62) 4) The various actors i.e. PIO, lead PIO, unified command and control system etc. 			✓	Against established policy that safety standards should be based on terminology in the Nuclear Safety Glossary and not contain individual glossaries
Finland	11.	General		Parts of the guide seem to be idealistic and there is no consideration on limitations in resources. Suggest to evaluate that all the				Specific points addressed. Note para 1.15 acknowledges the

				presented guidance is feasible and practicable to carry out during emergency. E.g. <i>4.55. Telephone inquiry hotlines should be established to handle questions by the public, the media and other interested parties. Telephone enquiry hotlines should be staffed sufficiently during a response to deal with the volume of calls. Staff from Technical and Scientific Support Organizations (TSOs) who can answer technical questions can be assigned to assist the hotline staff.</i>				need for a 'graded-approach' Added a line on responsibility of government
Finland	12.	General Chapters 3-5		Propose to merge chapters 3 to 5 and to remove unnecessary repetitions, in order to shorten the Guide. Overall content of DS475 is extensive and quite detailed. The document is now long and has uneven level of details . Prioritization is needed in safety guide text.				<i>My highlighting!</i>
Germany	13.	General	In some parts, the chapters 3 and 4 show overlaps/repetitions with regard to certain contents (e. g. the sub-chapters on "Public Communication Tools"). For instance, in the respective paragraphs on "Telephone enquiry hotlines" in 3.109. ff. and 4.55. ff. some aspects are mentioned twice (e. g. use of pre-recorded messages), others are not (e. g. ensuring the use of all relevant languages). Further streamlining of the text and ensuring a clear allocation of relevant contents could be taken into consideration.	To further optimise the legibility and usability of the document.				

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Russian Federation	14.	In general		Specification of nuclear/radiological emergencies and resulting peculiarities of arrangements for informational interfaces (II) were not reflected in the text adequately. These peculiarities obviously, are not confined to establishment of the "system of presentation of radiation hazard for health in the context". It is vital to show in the document, which is primarily addressed to PR specialists (clause 1.17) that the universal approach to informing about emergency situations in case of nuclear/radiological emergencies is insufficient.				<i>Unclear how to address</i>
Russian Federation	15.	In general		It is to be specified that severe accidents with necessity for protection of population are exceptionally uncommon. Due to this, firstly, neither the population, nor the participants of emergency response activities have any personal practical experience, secondly, specifics of response for such emergencies, especially in the part of making decisions on population protection and II, appear to be overlooked by organizers of the national emergency alert and response system. The distinctive attitude of the public to radiation hazard is the second key peculiarity of nuclear/radiological emergencies. And the case is not just about different perception of radiation risk by the population and technical specialists - this relates also to other types of health risks. This is a hypertrophied fear of radiation hazard, which is typical for many stratum of modern population, its social and professional groups, regardless of age and education, including scientific and technical, medical and other professional communities. The professional community of radiologists and radiation protection experts has for decades opposed to this phenomenon the scientifically based				<i>Unclear how to address</i>

				approach to managing radiation risks. Therefore, the key goal of the II in the event of a nuclear/ radiological emergency is the formation of a more adequate perception of radiation risks and so on by the society.				
Russian Federation	16.	In general		The text is filled with many repeated statements and recommendations of general nature . For instance, clause 2.27 refers to the population and the media requesting official sources to immediately provide full information about the emergency, but organizations-participants of emergency response need time to collect and verify the required information; same notion is repeated in clause 4.3. Clauses 2.29 and 4.41 point out the necessity to pivot from speculations and distribution of unverified information. Clause 3.103 and 4.42 discuss the necessity to ensure video recording of all formal addresses. In some cases there are literal iterations, for example, clauses 1.3 and 3.124, etc. Due to multiple logical iterations, the text is perceived as unnecessarily wordy and poorly structured .				<i>My highlighting</i>
Russian Federation	17.	Comments and observations		In addition to the comments above, and the detailed comments included in the table below, please see additional text appended to the table of comments by E.M. Melikhova of the Russian Academy of Sciences (on file).				
USA	18.	OVERALL COMMENT	This document would benefit from having a glossary. This document should also use consistent terminology.	For example, "Public Information Officer" and "Lead Public Information Officer" are used in various ways at different points in this document. Lead PIO is first used in paragraph 2.5, line 2, 1st sentence; then somewhat defined in a footnote on page 21. At other points in the document, the			✓	Preparation of glossary against established policy that safety standards should be based on terminology in the Nuclear Safety Glossary and not

				<p>word “spokesperson” is used.</p> <p>As another example, “preparedness stage,” “response stage,” “transition stage,” and “recovery stage” should be clearly defined. In addition, it should not be overlooked that the “preparedness stage” is synonymous with normal operations.</p> <p>Other examples include: “holding statement” is not clearly defined; organizational roles are not clearly stated (this contributes to the confusion over the national versus agency focus); “coordination” (in paragraph 2.14) is not clear regarding coordination among various government agencies or, coordination between the government and industry.</p>				<p>contain individual glossaries</p> <p>The individual examples reviewed and footnotes added or improved, as necessary</p>
China	19.	Para 1.3, line 1	Is modified to Effective communication with the public, which is INITIATIVE transparent	Initiatives are crucial for organizations facing emergencies				Comment unclear
China	20.	Para 1.3, Line 2	“is paramount ...” modified to “is very important”	Effective communication is very important, but taking effective preventive action and other response actions is paramount to mitigating the adverse consequences to human life, health, property and the environment from a nuclear or radiological emergency.	✓	<u>Modified to “is important” – very is superfluous.</u>		
India	21.	1.3	Furthermore it is required that in the development of such a system, due consideration shall be given to pregnant women, breast feeding woman and children as the individuals who are most vulnerable with regard to radiation exposure	Breast feeding woman are also vulnerable vis-à-vis dose to the infants			✓	This is a specific reference to Para. 5.72 in IAEA GSR Part 7, in which no reference is made to breast feeding women.

Japan	22.	Para 1.4/ Line 2	<p>This includes planning, training, exercising and continuously developing This will address development of a public communication programme, including a strategy and plan to be adequately prepared to communicate in case of a nuclear or radiological emergency, which will be continuously improving the programme for public communication in emergency response.</p>	To clarify the arrangements for public communication in preparedness stage. Also, “continuously improving” is necessary for effective public communication in response phase.		<p>✓</p> <p>This includes developing a public communication programme that includes a strategy and plans to be adequately prepared to communicate in the case of a nuclear or radiological emergency, which involves planning, training and exercising to continuously improve the programme</p>	Modified to slightly to improve English and to retain mention of ‘training and exercising’ from the original text
Japan	23.	Para 1.5/ Line 4	<p>For facilities within emergency planning zones and distances in category I or II and area in category V,</p>	To conform to “GSR Part 7, para 5.45”.	✓		
Pakistan	24.	1.11/2	<p><i>Please modify the text at mentioned location:</i> The primary objective of this Safety Guide is to provide guidance and recommendations to States on developing arrangements, at the preparedness stage and how to implement these in the response phase, for communicating with public and media</p>	For completeness		<p>✓</p> <p>Modified as follows: “and media and for implementing these arrangements and coordinating with all sources of official...”</p>	Clarity of language.

Japan	25.	Para 1.12/ Line 2	(a) A communication programme for ensuring transparent, timely, clear, factually correct, consistent and easily understandable information for communicating with the public;	To conform to para.1.3. “Effective communication with the public, which is transparent, timely, clear, factually correct, <u>consistent</u> and easily understandable, ...”			✓	Consistency of messaging is dealt with in (c). <i>If necessary, (c) could be expanded to cover consistency with other Safety Standards?</i>
Pakistan	26.	1.12/(b)	<i>Please modify the text at location:</i> Coordination, to the extent practicable, of different sources of information for a unified message.	To improve the quality of document			✓	This is dealt with by (c) on ‘consistent and effective messaging.
Russian Federation	27.	1.14	It is applicable for facilities and activities utilized for peaceful (civil) purposes , that can give rise to nuclear or radiological emergency that require emergency response actions.	Current statement « <i>It is applicable for all facilities and activities that can give rise to nuclear or radiological emergency that warrants emergency response actions</i> » shall be edited due to following. 1. It not fully consistent with scope of Safety Fundamentals No. SF-1 (para. 1.9) and Nuclear Security Fundamentals (para.1.14). 2. It doesn’t take into account strategies on clear categories consistent with the Member States’ needs and use, which are established in subpara. A para. 2 of SPESS A, according to which the safety requirements are governed by the objective and principles of the Safety Fundamentals and Safety Guides provide recommendations and guidance on how to comply with the safety requirements. The principles of Safety Fundamentals No. SF-1 (with account of its scope (para. 1.9) are applicable to facilities and activities utilized for peaceful (civil) purposes. 3. It doesn’t take into account consensus	✓			<i>Elena – added but please check!</i> I amended to be in line with GSR Part 7.

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				at the highest level on what constitutes a high level of safety (subpara. D para. 2 and Annex V of SPESS A) and principle of application of IAEA safety standards (Annex V of SPESS A) to facilities and activities utilized for peaceful purposes.				
China	28.	Para 1.15 and 1.18	Move content to other chapter	The content is not “Scope”				<i>Inclined to leave it – one para relates to scope of application the other with the scope of issues taken into account in its preparation. No other MS indicated need for moving these paras</i>
Japan	29.	Para 1.19/ Line 4-6	The effective implementation of protective actions and public trust is contingent on effective public communication backed by public trust.	Improve expression. Because the original location of “public trust” in this sentence is not appropriate.		✓ The effective implementation of protective actions and the maintenance of public trust are contingent on effective public communication.		Modified sentence retains sense that both implementation of protective actions and public trust are dependent on effective public communication
China	30.	Para 1.21 and 1.22	Move content to chapter ‘BACKGROUND’	The content are “Term” not “Scope”.			✓	These paragraphs define terms used within the document and are appropriate under the heading ‘Scope’
Finland	31.	1.21.	Terms are used in this Safety Guide as defined in GSR Part 7 [2] and the IAEA Safety Glossary, 2017 ⁶ Edition [8].	The newest Safety Glossary available is 2016 Edition. The reference 8 also refers to the Glossary 2017.	✓			

USA	32.	Page 8, para 1.22, line 2 (1st sentence)	It is recommended that line 2 be revised as follows, “The term ‘public communication’ in the context of this safety guide refers to any organizational element of the emergency response that is dedicated to communicating information on or related to a nuclear or radiological emergency to the following audiences:...”	The term “public communication” refers to the act of communicating, not the organizational structure.	✓	refers to any organizational element of the emergency response that is dedicated to communicating information		
USA	33.	Pages 8-9, para 1.23, lines 6-8 (5th sentence)	It is recommended that clarifying language be provided regarding line 8 specifically for the part of the sentence, “...and coordinating at different levels.”	It is suggested to include clarifying language for “...and coordinating at different levels.” It is currently not clear what is meant by “different levels” in the context of this safety guide.	✓	Replaced ‘different levels by’ ‘the different activities and individuals involved’ (to reflect the contents of Section4).		
China	34.	Chapter 2	“Maintaining trust” recommends professional communicators.	The government’s credibility is the result of the accumulated performance of the parties.				Suggested modification unclear
Canada	35.	2.1	As part of the overall emergency preparedness and response, the goal of public communication should be to support the overarching goals of the emergency response as outlined in para. 3.2 of GSR Part 7 [2], particularly the goals of keeping the public informed and maintaining public trust, <u>reducing or mitigating radiological and non-radiological consequences and preparing for resumption of normal activities. To achieve these goals</u> , the key objectives of public communication	Quality and Clarity: Informing the public is a key goal of emergency response as per GSR Part 7, but it is also a necessary action in order to achieve other goals, such as reducing the risk of stochastic effects (through effective implementation of protective measures), mitigating non-radiological consequences and preparing for the resumption of normal social and economic activity. As such, it is suggested to make an explicit link to these other emergency response goals, which are enabled by effective public communications.	✓	Added ‘but also’ before suggested addition to make clear that public communication supported all goals		

			regarding nuclear or radiological emergencies, should be to:					
China	36.	Para 2.1 (e)	Modified as follows: Prevent <u>the chain reaction of public panic and disorder</u> , and help ensure that actions taken do more good than harm	The explanation is not comprehensive			✓	The suggested addition would place greater emphasis on 'panic'. The comments of other Member States indicates the need to reduce this emphasis. Combined modifications proposed by USA and Finland adopted.
Finland	37.	2.1 (e)	Prevent panic Minimize harmful psychological effects and help ensure that actions taken do more good than harm	There are many different harmful psychological effects (such as severe stress and anxiety) that need to be taken into account during nuclear or radiological emergency than just preventing panic. Also, panic, as proper psychological term, is extremely rare in these kind of situations.		✓	To incorporate this comment and one from USA 'panic' replaced by 'unnecessary concern, minimize the potential for harmful psychological effects'	
Pakistan	38.	2.1/(c)	<i>Please modify the text at mentioned location:</i> Build and maintain public trust in emergency response by being consistent , transparent, timely and clear.	To make para more meaningful and comprehensive	✓			
Russian Federation	39.	2.1	1. To notify the population, both at the readiness stage and in the course of response, in regard to the nature of the threat protective activities and other response events in order to increase the level of execution of such measures; 2. To achieve and maintain	1. Within the framework of II it is impossible to protect the population without providing information. 2. It is only possible to prevent panic by providing proper information, thus prevention of panic can not be stated as a separate task. 3. Apart from the health issues, people shall be concerned about possible material and moral damage caused by the accident and these also should be	✓	Point 2 – the role of public communication vs. panic modified according to comments from Finland and USA. Point 3 – suggested addition added.		No action necessary on point 1 (restatement but retained wording consistent with IAEA terminology and with that used elsewhere in the draft).

			<p>the confidence of population in the course of emergency response by providing transparency, timeliness and clarity;</p> <p>3. To eliminate concerns of the population in regard to possible health hazard and material loss;</p> <p>4. To facilitate ensuring positive effect of such activities, which exceeds the negative impact;</p> <p>5. To minimize generation of rumors and to respond to misleading information;</p> <p>6. To provide possibility for stakeholders to make informed decisions.</p>	addressed.				
USA	40.	Page 9, para 2.1, line e	It is recommended that line e be revised as follows, "Prevent unnecessary concern and help ensure action taken by the public do more good than harm;"	<p>The word "panic" might not be the correct word to use when describing public concern. It is recommended to revise "panic" to "unnecessary concern".</p> <p>It is suggested to insert the wording "by the public" to provide clarity on who needs to take action.</p>	✓	<p>Slightly modified to incorporate comment from Finland</p> <p>'panic' replaced by 'unnecessary concern, minimize the potential for harmful psychological effects'</p>		
China	41.	Para. 2.2 Para. 2.30	"Public communication programme "in Para. 2.2 "An effective public communication for nuclear or radiological emergencies should..."and Para. 2.30 "Public communication should..."should be described in Para. 3.3-3.6.	Para.2.2 belongs "principles of public communication", Para.2.30 belongs "recognizing social context". Adding "See Para.2.2 or 2.30" in Para. 3.3-3.6.				<i>Comment unclear</i>

Pakistan	42.	2.2/3	<i>Please modify the text at mentioned location:</i> An effective public communication program for nuclear or radiological emergencies should ensure that all public communication will be transparent, timely, factually correct, in plain language for a general audience and well coordinated among official sources of information, in line with the national requirements on the protection of sensitive information.	To emphasize the importance of “one message, many voices” concept			✓	The addition of ‘well’ is unnecessary and would not have the effect suggested.
Russian Federation	43.	2.2	An effective community outreach program in the event of a nuclear or radiological emergency should ensure that public communications are transparent, timely, useful, relevant, implemented in a simple language for a wide audience and coordinated by official sources of information in accordance with national requirements for the protection of confidential information.	Usefulness of the information for consumers is overlooked. Obviously, if the official information satisfies all the above criteria, but is perceived as useless, people will look for other sources.	✓	<i>Included- ‘community- outreach’ in addition to ‘communication- programme’²</i>	✓ —	<i>Community outreach is covered by ‘public communication’ as a whole. Not appropriate to add here.</i> <i>Have retained ‘sensitive’ rather than ‘confidential’ included in the last line</i>
Canada	44.	2.3	All public communication in a nuclear or radiological emergency should be as transparent as possible. Transparency in communication should be based on openness and accountability and should be part of a process of long term communication activities contributing to building public trust <i>and mutual understanding</i> . Having public trust will strengthen the	Clarity: Public trust should not only be about ensuring that directions are followed, but that they are understood and accepted. Such understanding will facilitate the management of non-radiological impacts and recovery.	✓	<u>Accepted inclusion of “understand the measures to be taken” but not “mutual understanding” as the section is on transparency and not on a two-way process.</u>		

			likelihood that the public will <u>understand the measures to be taken and</u> comply with protective actions in case of a nuclear or radiological emergency....					
China	45.	Para 2.3, Line 7 – 11	In order to promote a culture of transparency, States should encourage communication even when information is incomplete... Even when information is incomplete, transparency can be maintained...	“Uncertain” is deleted from the expression. Organizations should monitor the spread of uncertain information to avoid confusion, misinformation and rumor.	✓		✓	Explaining uncertain information may be necessary — demonstrated by adding example provided in comments by USA.
Hungary	46.	2.3	In order to promote a culture of transparency, States should encourage communication even when information is incomplete or uncertain . Not having all of the information is not a justifiable reason not to communicate. Even when information is incomplete or uncertain , transparency can be maintained and used to build credibility and trust by communicating what is known, what is unknown and what steps are being taken to find out more.	In emergency situations States always deliberate whether or not to make the information public (doing more good, less harm) - in such a case uncertainty can generate unnecessary tension. An incomplete but sure piece of information can help building public trust but something coming from an uncertain source can lead to panic which is to be avoided.	✓		✓	Explaining uncertain information may be necessary — demonstrated by adding example provided in comments by USA.

47.	Page 10, para 2.3, lines 1-11	<p>Suggest adding examples at the end of the paragraph. Adding examples could help to emphasize good communication practices. For instance, suggest adding, <i>“After a radiological release, plume predictions may be the first type of information available for communication. Early plume predictions can be wrong, but providing caveats about the early data, communicators and technical experts can use this early data to educate the public about what is known about the situation, what responders are doing to learn more about the incident, and set expectations as to when the public will get more information.”</i></p>	<p>Providing examples at the end of this paragraph is an opportunity to highlight good communication practices about radiation response.</p> <p>Providing such an example not only helps the response organizations gain public trust, but, it is known from past events, that if the response organizations do not put out this type of information, someone, possibly with either less information about the incident or less knowledgeable about radiation response, is likely to fill that void.</p>	<p style="text-align: center;">✓</p> <p>Modified slightly to refer to the uncertainty of early data to address comments from China and Hungary suggesting deletion of ‘uncertain’.</p> <p>“For example, after a radiological release, plume predictions may be the first type of information available for communication. Early plume predictions will be uncertain, but providing caveats about the status of early data, communicators and technical experts can use these data to explain what is known about the situation, what responders are doing to learn more about the incident, and when the public will get more information.”</p>	<p style="text-align: center;">✓</p>	<p><u>Not standard practice to have examples within SG text.</u></p>
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Germany	48.	2.4	<p>... Therefore, organizations should make every effort to communicate in a timely manner and continuously, while remaining objective, clear and factually correct.</p> <p>[alternatively: insert definition of "objective"]</p>	<p>In para. 2.2. the document provides general requirements/goals regarding all public communication: it should be (i. a.) "transparent, timely, factually correct, in plain language for a general audience" etc. In doing so, the text reiterates/paraphrases what is laid down in the sub-chapter on the guideline's objectives (see para. 1.12. (a): "transparent, timely, clear, factually correct, and easily understandable").</p> <p>By asking to remain "objective", para 2.4. introduces another attribute which is not mentioned in the programmatic paras. mentioned above. This seems problematic as there is no single interpretation of the meaning of the term "objective". This term is often used as a synonym for being "factual" and not referring to subjective opinions, perceptions etc. At the same time, being "objective" could also imply that for instance all dissenting opinions on a certain issue should be displayed (e. g.: dissenting scientific papers and publications on potential consequences of low dose radiation). This interpretation of the term is common in journalism. To this end, the term "objective" should either be deleted (assuming that it should stand for "factual") or the text should provide for further clarification on the intended meaning of this term.</p>	✓		
Russian Federation	49.	2.4	<p>"The absence, incomprehensibility or ambiguity of information about health risks is the main cause of concern, fear and speculation among the population".</p>	<p>It is to be clarified that concerns and fears arise, first of all, due to the absence (and well as the incomprehensibility or ambiguity) of information about health risks.</p>		✓	<p>The paragraph is under the heading 'timeliness' – it is therefore only the timing (e.g. delay) that is of relevance to 2.4 and 2.5. The text indicates that delay is a major cause of anxiety (not the only one)</p>

China	50.	Para.2.5	The lead time for the initial message being issued should not exceed one hour when the nuclear power plant enters emergency state, a large amount of radioactive material has been released or may be released to the environment from the nuclear facilities, and the consequences of nuclear accidents beyond the boundary of the field zone, may seriously harm public health and environmental safety.	Reduce public panic.			✓	The suggested qualification suggests that it is only necessary to make a timely initial statement under certain conditions. Such statements may also be necessary for less serious events.
Finland	51.	2.5	A target lead time should be defined, at the preparedness stage by the emergency response planners in coordination with the lead Public Information Officer, for an initial communication with the public after the emergency response's public communication component of the unified command and control system has been activated. The lead time for the initial message being issued should not exceed one hour <i>thirty minutes</i> . This can be facilitated by using a holding statement developed at the preparedness stage (see para. 4.6).	One hour <i>after</i> the public communications component has <i>started</i> seems excessively long time for the initial communication.		✓	USA comment suggests modification to one hour from the time of the incident – accepted to address both comments	<i>If the change suggested by USA is agreed – will need to modify paras 3.99 and 4.37 to be consistent.</i>
USA	52.	Page 10, para 2.5, lines 1-6	It is recommended that paragraph 2.5 be revised as follows, "A <i>target time for an initial communication with the public should be identified in the preparedness stage by the emergency response planners</i>	Suggested rewording for clarity. It is also recommended to include the terms "lead time" and "holding statement" in a glossary.	✓	<u>Amended "lead time" to deadline and emended reference to content of the Holding Statement as this is set out in the response section.</u>		

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			<p><i>in coordination with the lead Public Information Officer. This initial message should not exceed one hour from the time of the incident. This can be facilitated by using a prescribed holding statement, which is an initial message acknowledging the event, conveying empathy if appropriate and identifying actions being taken to learn more (see para 4.6 and Annex V)."</i></p>		<p><u>Simplified language to read:</u></p> <p><u>"A target deadline for an initial communication with the public during a response should be defined at the preparedness stage by the emergency response planners in coordination with the lead Public Information Officer. The deadline for this initial message should not exceed one hour from the time of the incident. This can be facilitated by using a pre-scripted holding statement, developed at the preparedness stage."</u></p>		
Canada	53.	2.6	<p>Information released to the public in a nuclear or radiological emergency should be based on facts and verified information and should not give way to any speculation or inappropriate reassurances to appease public opinion. <u>However, as stated in 2.3, States should encourage communication even when information is incomplete or uncertain.</u> All information from official sources should be provided to the public to ensure that protective actions</p>	<p>Consistency: As noted in para 2.3, transparency speaks to communication even when information is incomplete or uncertain Para 2.6 should be aligned with this statement to achieve a common objective as opposed to competing requirements related to transparency and factual communication.-</p>	<p>✓</p> <p>Added with the addition of 'where appropriate' at the end of the sentence, <u>and with the deletion of "uncertain" to reflect comments from China and Hungary on 2.3 above.</u></p>		

			are correctly followed and to continue to build and retain trust.					
USA	54.	Page 11, para 2.6, line 2 (1st sentence)	It is recommended that line 2 be revised as follows, "...and verified information should not give way to any speculation..."	Suggested rewording for clarity and simplification	✓			
USA	55.	Page 11, para 2.6, lines 3-5 (2nd sentence)	It is recommended that the 2 nd sentence be revised as follows, " All information from Official sources should provide information to the public to ensure that ..."	Suggested rewording for clarity because 'official sources' should be the group delivering the information.	✓			
Germany	56.	2.7.	... Information should therefore be <u>objective factual and transparent</u> even if it places the source of information in a negative light. Showing this level of objectivity can, conversely, help increase public trust.	Follow-up on comment no. 2: assuming that the new wording proposed properly reflects the intended meaning.	✓			

USA	57.	Page 11, para 2.7, lines 1-2 (1st sentence)	It is recommended that the 1 st sentence be revised as follows, “Information provided to the public should place public health and safety first and should not be influenced by management reputation management or financial or political implications.”	Suggested rewording for clarity.		Deleted ‘reputation management’ and included reputation in subsequent sentence for clarity.	✓	Comment unclear – rewording does not aid clarity.
USA	58.	Page 11, para 2.7, lines 2-3 (2nd sentence)	It is recommended that clarifying language be provided to the 2 nd sentence. As currently written, the phrase “places the source of information in a negative light” is not clear regarding the intent of this statement.	As written, the 2 nd sentence was not clear by stating “places the source of information in a negative light”. Does that imply that the information is hard to deliver? Or is someone spreading incorrect information that needs to be corrected? Or did an organization miscommunicate about an action that either the licensee or public should take?		Modified to: “Information should therefore be objective factual and transparent even if it has a negative impact on the reputation of the source of information.”	✓	
Argentina	59.	Para 2.8 Title	Understandable (instead of Plain Language)	Logical sequence. The chapter refers to principles and plain language is a specific technique to convey technical materials to general audience. Another technique can be infographics.			✓	‘Plain language’ is the appropriate term. It is defined in the Oxford English Dictionary as ‘speech or writing that is direct, straightforward, unostentatious, or easily understood’. Explanation added within text.
Japan	60.	Para 2.8/ Line 3-4	The use of technical or scientific language terms should be reduced to an essential minimum.	Improve the wording.	✓			
Japan	61.	Para 2.8/ Line 7 (last sentence)	The level of plain language chosen should not exceed a level understandable to adolescent. The selection and the use of plain language should be carefully considered so that a wide	To improve the expression. This is because a level understandable to adolescents is unclear and its level is not quantitatively expressible. Therefore, this sentence should be corrected to practically executable expressions.		Slightly modified English: “The selection and use of plain language should be carefully	✓	

			range of generations including young people can easily understand.			considered to ensure that it is understandable to all-range-of generations, including young people "			
Russian Endorsement	62.	2.8	"... The chosen level of language simplicity should not exceed the level understood by a 12-year-old".	By definition of WHO, the adolescent period lasts from 10 to 19 years. Obviously, the level of knowledge of a person during this time varies greatly. Experts in risk communication in the ES recommend to focus on the level of a 12-year-old.			✓	Superseded by modification suggested by Japan (making reference to all-range-of generations, including young people).	
Japan	63.	Para 2.10/ Line 1 on page 12	commonly understood or used by the general public in everyday life , they have no real meaning in terms of creating ...	Add the explanation.			✓	The addition does not add clarity	
Japan	64.	Para 2.10/ Line 2-4 on page 12	While the use of units should be avoided whenever possible, how they relate to radiological health hazards should be clearly explained.	Just comment. The last sentence is very suggestive and important, so it should be kept as it is.	✓				
Poland	65.	2.10	It shall be considered to include comparisons while using radiological units. Those comparisons should define the values of the units during normal and emergency situations, including how much values present during the emergency are exceeding values during normal situation.	This text should be considered to be added to the paragraph. The comparison of the radiation units which can be present during the emergency to the values which are present during normal situation should give better understanding to the public.		✓		Following added" "...it may be useful to include comparisons for example between the values present during the emergency and under normal conditions" to additional text suggested by USA.	

USA	66.	Page 12, para 2.10, lines 9-10 (7th sentence)	It is recommended that another sentence be added at the end of paragraph 2.10 as follows, “ <i>For example, as monitoring and sampling data become available, the results and their units will need to be put into perspective.</i> ”	Suggested wording to emphasize communication of complex data to the public.	✓	Added following to include this comment and one from Poland: “As monitoring and sampling data become available, the results and their units will need to be put in perspective and it may be useful to include comparisons for example between the values present during the emergency and under normal conditions.”		
Canada	67.	2.12	<u>When putting radiological health risks in perspective,</u> organizations should refrain from comparing any prospective inference of radiation risks in a nuclear or radiological emergency with other risks (see para. 3.127). <i>{Add an explanation for this.}</i>	Quality and Clarity: As written, the text is confusing, particularly as the next paragraph talks about using comparisons. Since para 2.13 provides guidance on using comparisons, then paragraph should explain the overarching concern with their use.	✓			
Finland	68.	2.12	Organizations should refrain from comparing any <u>prospective inference of radiation risks</u> in a nuclear or radiological emergency with other risks (see para. 3.127).	Needlessly difficult expression. Change to expression that is easily understandable to non-native English speakers.				<i>Need to use phraseology consistent with agreements on attribution etc.</i>
Russian Federation	69.	2.12	“Organizations should refrain from comparing any projected radiation risks from a nuclear/radiological accident with other risks (see No. 3.127)”	The authors' idea is unclear, since in paragraph 3.127 nothing is said about the risks or their comparison.	✓			

Germany	70.	2.13.	... Experience from past emergencies shows that the comparison with natural background levels or radiation received from nuclear applications <u>and medical applications involving the use of radiation</u> can alleviate public anxiety [9].	With regard to the aim of establishing a context that allows laypersons to put certain radiation levels into perspective, special emphasis should be placed on medical applications that are not “nuclear” but common to most people, i. e. X-ray or CT.	✓			
Finland	71.	2.14	Requirement 2 of GSR Part 7 [2] requires that roles and responsibilities in emergency preparedness and response are clearly specified and clearly assigned. Para. 4.10 of Requirement 2 of GSR Part 7 [2] requires that the government establishes a national coordinating mechanism to be functional at the preparedness stage, consistent with its emergency management system. Furthermore it requires that one of the functions of this national coordination mechanism is to coordinate effective communication with the public in preparedness for a nuclear or radiological emergency.	Unnecessary repetition.	✓			

Finland	72.	2.14	<p>Requirement 2 of GSR Part 7 [2] requires that roles and responsibilities in emergency preparedness and response are clearly specified and clearly assigned. Para. 4.10 of Requirement 2 of GSR Part 7 [2] requires that the government establishes a national coordinating mechanism to be functional at the preparedness stage, consistent with its emergency management system. Furthermore it requires that one of the functions of this national coordination mechanism is to coordinate effective communication with the public in preparedness for a nuclear or radiological emergency. Organizations should make all efforts to ensure consistency in messaging as conflicting messages create confusion, misinformation and rumours. Therefore, <u>public communication should be coordinated with all official sources of public information</u>, as well as with additional appropriate stakeholders, involved to ensure consistent messaging. Inconsistencies in information released to the public also have the potential to cause a loss of trust in the response.</p>	<p>This only repeats the requirement of para. 4.10 of GSR Part 7 in more vague form. Consider revising for more specific description or removing.</p>	✓	<p>End of paragraph re-iteration of beginning from the point underlined in these comments and therefore deleted.</p>		
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Russian Propositions	73.	2.14	“Information for the public should be coordinated with all official sources of information, as well as with relevant additional stakeholders.”	It is not clear how the concept of “stakeholders” is related to the notion of “interested parties”, which occurs more often in the text and is explained in paragraph 4.28.	✓	Deleted		
Finland	74.	2.15	‘One message, many voices’ describes an approach for sending coordinated and consistent messages from different levels and organizations using various communication channels and tools. All organizations responsible for responding to an emergency should convey a consistent message throughout the emergency.	The main point of the approach is production of consistent messages. Coordination is tool to reach the consistency. Suggest removing “coordination” here for clarity.			✓	There may be other forms of coordination necessary, e.g. in timing – therefore word retained.
Finland	75.	2.15		The paragraph is very vague. There is no indication on how to build or implement such an approach or what to take into account for building such an approach. Either remove the paragraph or revise to more specific form or to form that more clearly refers to paragraphs around it.	✓	Text modified as follows: “ All Organizations responsible for responding to an emergency should <u>coordinate to</u> convey a consistent message throughout the emergency, using various communication channels and tools. Hearing the same message from various trusted sources is likely to increase the level of public trust in the message. This is referred to as the ‘One message, many voices’ approach. Important factors to considered in		<i>Not sure this fully deals with the comment but incl. reference and intro. To one message many voices - OK?</i>

						applying this approach are presented in paras 2.16 – 2.17.		
USA	76.	Page 13, para 2.15, lines 3-4 (2nd sentence)	It is recommended that another sentence be added at the end of paragraph 2.15 as follows, <i>“Hearing the same message from various trusted sources increases public trust in the message.”</i>	It is suggested to add more language on when ‘one message, many voices’ should be used. Providing additional information on this concept is especially important when talking about health implications, where protective actions are needed, and equally as important, where protective actions are NOT needed. This type of message needs to be closely coordinated.	✓	Slight modification: <i>“Hearing the same message from various trusted sources is likely to increase the level of public trust in the message.”</i>		
USA	77.	Page 13, para 2.16, lines 1-3 (1st sentence)	It is recommended that the 1 st sentence be revised as follows, <i>“All relevant involved organizations should only communicate information to the public...”</i>	Suggested rewording for clarity. The use of the word ‘only’ appears to contradict the ‘one message, many voices’ concept in paragraph 2.15.	✓			
Finland	78.	2.17	Para. 5.70 of Requirement 13 of GSR Part 7 [2] requires arrangements to be in place to ensure that all information provided to the public by response organizations, operating organizations, the regulatory body, international organizations and others is coordinated and consistent. In general, the primary source of information in a nuclear or radiological emergency will be the designated lead Public Information Officer within the unified command and control system established, although this position may be supported by other organizations according to their mandates. A coordination mechanism should be implemented to	Already described in 2.14. Remove from here.	✓			

			ensure message consistency. Procedures should be drafted, agreed upon and exercised amongst the different sources of information. This should include information sharing procedures in an emergency amongst Public Information Officers (PIOs).					
Pakistan	79.	2.17/8	<i>Please modify the text at mentioned location:</i> Procedures should be drafted, agreed upon and exercised amongst the different sources of information at preparedness stage.	For clarity of purpose.	✓			
Finland	80.	2.17 footnote 1		The term PIO is defined ambiguously. It is not clear whether the term is meant to use person responsible for communication to media in normal situations or in emergency situation or both.				
China	81.	Para.2.18, line 5,	is modified to the amount of PROBABILITY harm that ...	Risk is actually a kind of uncertainty.	✓	Modified to: the probability that harm that may result		
China	82.	Page10	PRINCIPLES OF PUBLIC COMMUNICATION need to add one more PRINCIPLE, add as follows: <u>Available</u> <u>2.18 The public get access to the needed information easily. All relevant involved organizations should communicate information to the public with the most convenient way for the public. Besides the traditional ways such as TV, video, newspaper, magazine, the new media of News Websites.Social software, Mobile Terminal</u>	One more important PRINCIPLE has been lost.				<i>Seems OK to me – an additional heading of 'Availability' could be added if agreed</i>

			should be more used.					
Japan	83.	Para 2.18-2.20		<p>The definition of risk perspective during an emergency might not be adequacy.</p> <p>In particular, the first sentence of para 2.18 is not clear because normally risk perception is used to explain the gap of risk between experts and public during regular communication and consultation.</p>		<p>✓</p> <p>Sentence modified to:</p> <p>“It should be considered that the public’s perception of risk may be different from assessments provided by radiation protection experts and that this may affect public communication during a nuclear or radiological emergency.</p>		
USA	84.	Page 13, para 2.18, lines 1-2 and 5-7 (1st and 3rd sentences)	It is recommended that the type of ‘expert’ be defined in paragraph 2.18, specifically in the 1 st and 3 rd sentences.	The 1 st and 3 rd sentences should include clarifying information regarding the type(s) of ‘expert’ being discussed. Is the ‘expert’ in science, risk communication, radiation, etc.?		<p>✓</p> <p>“radiation protection” added for clarity</p>		
Japan	85.	Para 2.19/ Line 5	IAEA Safety Standard Series No. GSG- 6X (DS460)	DS460 has finalized. Recently it has published as the new IAEA Safety Guide GSG-6 "Communication and Consultation with Interested Parties by the Regulatory Body."	✓			
Finland	86.	2.20		First sentence of the paragraph is very difficult to understand and needlessly complicated. Revise to form that is easily understandable to non-native English speakers.	✓	<p>Shortened for clarity</p> <p>Communication efforts can also be impeded by the public’s perceptions of risks for the reasons described</p>		Incl. addressing comment from Japan

					<p>above, and by The use of scientific terms or variations in scientific units without plain language explanations during the emergency that also place radiological health hazards in perspective...</p>	
Finland	87.	2.20	<p>Communication efforts can also be impeded by the public's perceptions of risks for the reasons described above, and by the use of scientific terms or variations in scientific units without plain language explanations during the emergency that also place radiological health hazards in perspective. <u>Communication that does not use plain language and instead focuses on scientific terms or variations in scientific units for explanation of radiological health hazards during the emergency will also add to an increased perception of risk because this kind of communication emphasizes the science over the safety of the audience and their need to understand the situation.</u> Clear, consistent information can calm fears, but unclear information can lead to misunderstanding or confusion in the public's perception of risk and thus, communication with the public during</p>	<p>Underlined sentence should be moved to 2.10. Also, consider changing the expression that is easier to understand.</p>	<p>✓</p> <p>Deleted – additional sentence added to para 2.10</p> <p>“The use of scientific terms or scientific units, without plain language explanations that place radiological health hazards in perspective, may have an adverse impact on the public's perception of risk.”</p>	<p>Incl. addressing comment from Japan</p>

			<p>preparedness and the emergency should be in consistent plain language information and messages. Further information on developing messages for the public based on the principles of public communication and taking into account aspects of risk perception is provided in Section 3, PC-AG.6 of Ref. [10].</p>				
Finland	88.	2.20	<p>Communication efforts can also be impeded by the public's perceptions of risks for the reasons described above, and by the use of scientific terms or variations in scientific units without plain language explanations during the emergency that also place radiological health hazards in perspective. Communication that does not use plain language and instead focuses on scientific terms or variations in scientific units for explanation of radiological health hazards during the emergency will also add to an increased perception of risk because this kind of communication emphasizes the science over the safety of the audience and their need to understand the situation. Clear, consistent information can calm fears, but unclear information can lead to misunderstanding or confusion in the public's perception of risk and thus, communication with the public during</p>	<p>Already included in 2.8. Unnecessary repetition here.</p>		<p>✓</p> <p>Paragraph deleted – additional sentence added to para 2.10</p> <p>“The use of scientific terms or scientific units, without plain language explanations that place radiological health hazards in perspective, may have an adverse impact on the public's perception of risk.”</p>	<p>Incl. addressing comment from Japan</p>

			<p>preparedness and the emergency should be in consistent plain language information and messages. Further information on developing messages for the public based on the principles of public communication and taking into account aspects of risk perception is provided in Section 3, PC-AG.6 of Ref. [10].</p>					
Japan	89.	Para 2.20	<p>Communication efforts can also be impeded by the public's perceptions of risks for the reasons described above, and by the use of scientific terms or variations in scientific units without plain language explanations during the emergency that also place radiological health hazards in perspective. Communication that does not use plain language and instead focuses on scientific terms or variations in scientific units for explanation of radiological health hazards during the emergency will also add to an increased perception of risk because this kind of communication emphasizes the science over the safety of the audience and their need to understand the situation. Clear, consistent information can calm fears, but unclear information can lead to misunderstanding or confusion in the public's perception of risk and thus,</p>	<p>Delete this paragraph.</p> <p>In this paragraph 2.20, the first sentence is not appropriate for the IAEA document, therefore it should be deleted. When communicating with the public, the existence of risk perception should be kept in mind. Individual risk perception and experience of concerns/fears should not be denied and disrespected.</p> <p>Regarding other part of this paragraph, need some rewriting and move to another section.</p> <p>Because in this paragraph, the harm caused by using technical terms and problem resulting from risk perception are mixed and confused.</p> <p>Communication without explanation in plain language decreases the depth of understanding of radiation health effect and emergency situation. Communication without plain language is not related to risk perception. Emotion is one of big contribution factors.</p> <p>Importance of the use of plain language should be described in another paragraph or section.</p>		✓	<p>Paragraph deleted – additional sentence added to para 2.10</p> <p>“The use of scientific terms or scientific units, without plain language explanations that place radiological health hazards in perspective, may have an adverse impact on the public’s perception of risk.”</p>	Incl. addressing comment from Finland

			communication with the public during preparedness and the emergency should be in consistent plain language information and messages. Further information on developing messages for the public based on the principles of public communication and taking into account aspects of risk perception is provided in Section 3, PC AG.6 of Ref. [10].				
China	90.	Para. 2.21	modified to:Arrangements should be made at the preparedness stage to identify and address, to the extent practicable, misconceptions, rumors and incorrect and misleading information.(see Para 5.74 of Requirement 13 of GSR Part 7 [2]).	Grammar mistake: "arrangements be made " should be modified to "arrangements should be made".		✓	Grammar appropriate for reference to GSR Part 7 that 'requires that...'
Germany	91.	2.21. – 2.23.	Rumours, hoaxes and unintentional misinformation 2.21. Para 5.74 of Requirement 13 of GSR Part 7 [2] requires that arrangements be made at the preparedness stage to identify and address, to the extent practicable, misconceptions, rumours and <u>deliberately fabricated</u> incorrect and misleading information (<u>hereinafter</u> referred to as “hoaxes”). 2.22. Rumours will arise from various sources during a	In its current form, in particular 2.22. and 2.23. address first and foremost cases of rumours. So-called “hoaxes” (i. e. deliberately fabricated misinformation) are to be differentiated from mere rumours as they always imply a mal evolent purpose (whereas rumours can result from mere misunderstandings) but have to be addressed by respective measures with the same urgency as rumours. To allow for completeness, other unintentional forms of misinformation are also included in the text proposed.		✓	Para 5.74 of GSR Part 7 refers to “misconceptions, rumours and incorrect and misleading information”, and is correctly referred to in the draft text.

			<p>response. Ref. [10] provides detailed information on rumours and the response to them. Social media has intensified this challenge, facilitating the almost instant spreading of rumours, <u>hoaxes</u> and <u>unintentional</u> misinformation. Arrangements for responding to rumours <u>these forms of misinformation</u> should be applied as it is essential to ensure that m misinformation does these do not lead to decision making based on false information and consequently to actions being taken beyond those emergency response actions that are warranted and could do more harm than good (see para. 5.74 of Requirement 13 of GSR Part 7 [2]).</p> <p>2.23. The arrangements made for responding to rumours, <u>hoaxes and unintentional misinformation</u> should enable the identification of <u>such forms of misinformation</u> and rumours through media monitoring (see para. 3.79–3.80) and the correction of this information via the various public communication tools (see paras 3.95–3.123).</p>					
USA	92.	Page 15, para 2.24, lines 5-8 (5th sentence)	It is recommended that the 5 th sentence be revised as follows, <i>“In an emergency, the higher the level of trust, the more likely the public will be willing to comply with protective and</i>	Suggested rewording for clarity.	✓			

			<i>other response actions, reducing the risk that the public actions will take unwarranted actions be taken beyond those emergency response actions that are warranted.</i>				
Finland	93.	2.25	Para. 5.45 of Requirement 10 of GSR Part 7 [2] stipulates that arrangements shall be in place for facilities in category I and II and areas of category V to provide the population public with information on the response to a nuclear or radiological emergency, including on the potential for such emergencies, the nature of the hazards, how people would be warned or notified and on the actions to be taken. Such public communication activities at the preparedness stage will help to familiarize the public with the facility and associated emergency arrangements.	Consistent terminology.		✓ Text modified to 'various groups of the population' to be more consistent with GSR Part 7.	Para. 5.45 refers specifically to different groups of the population.
Japan	94.	Para 2.27	The early hours of the response to a nuclear or radiological emergency are crucial for public communication activities. Social media, for example, increases the pressure for timely communication. Not providing an early statement also allows other unofficial sources of information to spread information. While the public and specific groups of interested parties demand immediate and comprehensive	Add the explanation at the end of this paragraph 2.27. On 11 March 2011, the NISA (the former nuclear regulatory body in Japan) made an arrangement for information provision immediately after the earthquake. The first press briefing was after 30 minutes of the earthquake occurrence. 15 briefings were held within 24 hours. At that time, information about plant status was unavailable, because of the station blackout (SBO). Quick arrangements and responses for information dissemination were conducted by the NISA, but it lacked		✓ "In such cases, it is desirable to clarify which types of information are confirmed or unconfirmed and to indicate the timescales and conditions under which further information will be disseminated."	Slight modification to improve clarity of the English

			<p>information, the emergency response organization might not have details confirmed early on. Arrangements should be made to immediately communicate to the public even when detailed specific information is not available. In such case, it is desirable to clarify what kind of information is confirmed and unconfirmed, and then to convey the prospects for the future information dissemination.</p>	<p>in efforts to convey the possibilities and the prospects about detailed information provision. As a matter of fact, it is difficult to clarify the possibility and prospect, in the chaos of an emergency. But the effort is necessary. In light of such lessons learned from the Fukushima Daiichi nuclear accident, a more detailed explanation is necessary and should be added at the last of this paragraph.</p>				
Canada	95.	2.29	<p>Accuracy should not, however, be sacrificed for timeliness. A single piece of inaccurate information can damage the public's trust in the response and jeopardize all communication objectives. This might consequently lead to actions being taken beyond those emergency response actions that are warranted. Unconfirmed or speculated information should not be released to the public.</p>	<p>Consistency: Timeliness and accuracy should be addressed in the context of para 2.3 Transparency, which states that transparency speaks to communication even when information is incomplete or uncertain Para 2.29 should be aligned with this statement to achieve a common objective as opposed to competing requirements.</p>	✓	<p>Following text added: "However, in the interests of transparency, it may be necessary to release incomplete or uncertain information, accompanied by appropriate explanations and caveats, as indicated in Para. 2.3."</p>		
China	96.	Para.2.31	<p>"When organizing public communication activities, arrangements should be made to ensure that all members of interested parties can participate in them."---"all" modified to "as many as possible".</p>	<p>Interested parties involve a wide range of people, and may span geographic and time zones. This material should follow the principle of "reasonable and possible".</p>		<p>✓ 'key' added</p>		<p>Following suggestion from Japan</p>

Japan	97.	Para 2.31/ Line 2-3	When organizing public communication activities, arrangements consideration should be made given to ensure that all members of key interested parties can participate in them.	As stated in Paragraph 4.28, “interested parties” has a broad sense. Addition of the word “key” is necessary to make a concrete expression.	✓ ‘key added’ <i>‘Consideration’ is a significant weakening from ‘arrangements should be made’</i>	<i>The suggestion to change to consideration should be given to is a significant weakening from ‘arrangements should be made’ OK?</i>
Finland	98.	2.34	The increased demand for two-way communication during a nuclear or radiological emergency is also challenged by the changing media landscape and the rise of social media. Official information can now be disseminated quickly and directly to the public. Two-way communication demands resources, faster paced information dissemination and <u>continuous engagement around the clock</u> , depending on the emergency.	Continuous engagement around the clock is also needed for other purposes even outside two way communication. Suggest making this its own paragraph for example under “Maintaining trust”	✓ Text retained but additional text added to the end of the 2nd sentence of the section on ‘maintaining trust’, as follows: “Gaining public trust takes times and may require continuous engagement with the public around the clock ”	The need for ‘around the clock’ engagement is also mentioned under other headings so reasonable to retain here but strengthen as suggested.
USA	99.	Page 16, para 2.34, lines 1-2 (1st sentence)	It is recommended that the 1 st sentence be revised as follows, <i>“The increased demand for two way communication during a nuclear or radiological emergency is also challenged by the changing media landscape and the rise of social media have increased the demand for two-way communication during a nuclear or radiological emergency.”</i>	Suggested rewording for clarity.	✓	
China	100.	Para.2.35	Delete Para.2.35	This section is about the principle of two-way communication. But Para 2.35 is the result of a slow or lack of communication. The suggestion is put para.2.35 in.	✓ Deleted. Para 2.27 expanded to include	

						contents “Not providing an early statement also allows other unofficial sources of information to spread information. This may foster and accelerate the spread of rumours and misinformation and lead to a loss of trust ”.	
Japan	101.	Para 2.35	Lack of or slow communication on social media will rapidly lead to a loss of trust and foster and accelerate the spread of rumours and misinformation. Such a situation will lead to a loss of trust.	Rewrite. (see the left column)	✓		Suggested change in order incorporated in replacement text added to Para. 2.27.
USA	102.	Page 17, para 2.36, lines 4-5 (3rd sentence)	It is recommended that the 3 rd sentence be revised as follows, “Codes of conduct should be drafted <i>before a response</i> to inform staff members of the rules....”	Suggested rewording to indicate that this type of code of conduct should be developed before the response to a nuclear or radiological emergency. This type of code of conduct should be drafted during preparedness.		✓ Inserted ‘at the preparedness stage’	Consistency of terminology used elsewhere in the document
Finland	103.	General Chapter 3	Interested Party Dialogue and Engagement should be earlier within chapter (between Public Communication Strategy and Public Communication Plan for example).	Interested Party Dialogues and Engagement contains definitions and descriptions that are referred to earlier in the chapter. For clarity, it should be located earlier within Chapter 3.			

Formatiert: Hervorheben

Finland	104.	3.1	<p><i>An effective emergency management system requires effective public communication at all stages: preparedness, response and the transition to an existing or planned exposure situation. Setting up the arrangements at the preparedness stage should facilitate communication in the later stages.</i> Para. 4.1 of Requirement 1 of GSR Part 7 [2] requires governments to ensure that an emergency management system is established and maintained for the purposes of emergency response to protect human life, health, property and the environment in the event of a nuclear or radiological emergency. This section of the Safety Guide elaborates on the arrangements that should be put in place at the preparedness stage in order to effectively communicate with the public in response to a nuclear or radiological emergency. An effective emergency management system requires effective public communication at all stages: preparedness, response and the transition to an existing or planned exposure situation. Setting up the arrangements at the preparedness stage should facilitate communication in the later stages.</p>	<p>Suggest moving the general description to the beginning of the paragraph. Also, suggest including the first sentence somewhere in the introduction of the document, it sets up the whole theme.</p>			✓	<p>Initial description of requirements is more consistent with the format adopted elsewhere in the document.</p>
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Japan	105.	Para 3.2	A public communication programme is an overarching structure for organizing public communication during an emergency. A public communication programme should be included in the whole protection strategy.	To clarify the relation between the protection strategy and the public communication strategy in this guide.		✓ "Para 5.69 of Requirement 13 of GSR Part 7 specifies that communication with the public should be "carried out on the basis of a strategy developed at the preparedness stage as part of the protection strategy" [2].."	Link between the communication and protection strategies strengthened by direct quotation from GSR Part 7. <u>Added wording to Section 3.7 on "Public Communication Strategy".</u>
Finland	106.	3.4	The public communication programme, including resources, should be approved by the responsible response organization or organizations. Appropriate resources — financial and human — should be allocated on a continuing basis to ensure preparedness and to maintain a high level of readiness to respond to an emergency.	Repeated in 3.46. Suggest removing this paragraph as unnecessary repetition.			✓ It is necessary to retain mention of resources and approval of public communication programme under this heading.
Japan	107.	Para 3.4/ Line 2	The public communication programme, including resources, should be approved by the responsible response organization or organizations.	Delete the words, because of duplication.			✓ The wording allows for the possibility of approval process involving more than a single organization
China	108.	Para.3.8, line 1	"A graded approach" should be complemented.	A graded approach is the basis of public communication strategy, but the guidance described it simply. It is difficult for the reader to understand how the graded approach is used.		✓ Reference to Para 1.15 added, which includes definition of 'graded approach'	Addition reference and the change suggested by USA add clarity.

USA	109.	Page 18, para 3.8, line 2 (2nd sentence)	<p>It is recommended to revise the 2nd sentence as follows, “Related to public communication during a nuclear or radiological emergency, a graded approach describes the principle to scale the response to the actual or expected impact of a nuclear or radiological emergency on the need for and the extent of public communication activities, based on the emergency’s characteristics and magnitude.” This approach scales the public communications response based on the emergency’s characteristics, magnitude and actual or expected impact.”</p>	Suggested rewording for clarity and simplification.	✓			
Japan	110.	Para 3.9/ Line 2	<p>The public environment within which the public communication strategy will be implemented should be considered. Surveys should therefore be made to understand the public risk perception and information needs on a national level and among the potentially affected population around nuclear facilities or in areas with regular activities using ionizing radiation.</p>	It is not enough to just understand public risk perception. As the result of the survey, information needs can also be clarified.	✓			

USA	111.	Page 19, para 3.12, line a	It is recommended that line a be revised follows, “Be tailored to the chosen public communication strategy taking into account the relevant potential emergencies derived on the basis of hazard assessment scenarios, in order to achieve successful communication with the public and other interested parties during a nuclear or radiological emergency; ”	Suggested rewording for clarity and conciseness	✓			
Japan	112.	Para 3.13	<p>(a) A description of the responsibilities and organizational structure of the public communication response;</p> <p>(b) A description of the concept of operation for communicating with the public during an emergency;</p> <p>(c) A description of the available infrastructure and resources;</p>	<p>To function the PIO in the unified command and control system work effectively, it is important to include the concept of operation in the public communication plan.</p> <p>[Ref: EPR-Public Communication Plan (2015), P.1, “The plan describes the organization, roles, responsibilities, principles and <u>concept of operation for communicating with the public during an emergency.</u>”]</p>		<p>✓</p> <p>Bullet (e) modified to refer not only to the communication strategy but also to concept of operation.</p>		<p><i>Would this be covered by (e)? Have provisionally modified (e) to address this</i></p>
Finland	113.	3.16	<p>Tasks, responsibilities and coordination of the various organizations who will be involved in public communication during a nuclear or radiological emergency should be planned and defined in advance, and reflected in all organizational, local and national response plans.</p>	Repeats 3.3. Suggest removing or replacing with reference to 3.3.		<p>✓</p> <p>Reference to para 3.3 added</p>		<p>Important information – repetition reasonable if supported by cross-reference.</p>

Japan	114.	Para 3.17 Footnote 6		The difference between “lead PIO” and “spokesperson” is not clear in the Footnote 6. Please clarify and add more detailed explanation to the Footnote 6.				
China	115.	Para.3.24	At the preparation stage, process of source, transmission and collection for information in press release should be established, and the responsibilities of staff in the process should be defined. Training and exercise also should be reinforced.			✓ Text added to para 3.24 after first sentence: “ The processes for the collection and transmission of information should also be established at the preparedness stage and the approval process ” Text added to end of para 3.25: “ The roles and responsibilities should thus be clearly defined and reinforced through training and exercises. ”		The processes for information collection and roles and responsibilities are dealt with in different paras, as indicated.
USA	116.	Page 22, para 3.24, lines 1-2 (1st sentence)	It is recommended that the 1 st sentence be revised as follows, “Arrangements for a clearly defined approval process of official public information and messages should be made <i>in the preparedness stage and should be followed and adapted, as needed.</i> ”	Suggested rewording for completeness. This revision coincides with information contained in the 3 rd sentence.		✓ Reference to preparedness stage included at the end of the sentence.		The words ‘followed and adapted, as needed’ not included because they are implied throughout.

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Finland	117.	3.27	The national authorities involved in public communication may include the competent authority under the Assistance Convention and under the Convention on Early Notification of a Nuclear Accident (the 'Notification Convention') [1], national coordinating authority, disaster management authority, national health and welfare authority, regulators, corporate office of the operators, and other ministries.	The other organisations mentioned here are not ministries. Another possibility: "... <i>and various ministries.</i> "	✓			
Germany	118.	3.27	... The national authorities involved in public communication may include the competent authority under the Assistance Convention and under the Convention on Early Notification of a Nuclear Accident (the 'Notification Convention') [1], national coordinating authority, disaster management authority, national health and welfare authority, regulators, <u>Technical and Scientific Support Organisations (TSOs)</u> , corporate office of the operators, and other ministries.	In some countries, the national TSOs play an integral part in the arrangements on dealing with nuclear or radiological emergencies. Therefore, their role in communicating with the public should be addressed explicitly in the guideline, too. [TSOs are also referred to in para. 4.55.]	✓			
China	119.	Para. 3.28	the second line, from the bottom: This coordination mechanism should be established by regulations, and its capability should be tested through regular training and exercises.	Coordination may be divided into two aspects: mechanism and capability. Mechanism should be established by the regulations, and capability may be tested by the training and exercise.		✓ Following text added: "This coordination mechanism should be established as part of emergency plans and arrangements and its capabilities should be tested		'Plans and arrangements' more generic than 'regulations' and likely to be applicable to all Member States.

					through regular training and exercises.”		
Finland	120.	3.28		<p>This sounds like an impossible task. Should also those statements that are given in interviews to the media go through the coordination system?</p> <p>“... Additionally, <i>any statements</i> providing advice to the public should be coordinated through the unified command and control system with all other response authorities. This coordination should be established and tested through regular training and exercises. “</p>	<p>✓</p> <p>Replaced ‘any’ by ‘key’ statements</p>		Additional modifications in response to comment from USA
USA	121.	Page 22, para 3.28, line 4 (2nd sentence)	<p>It is recommended that another sentence be added after the 2nd sentence as follows, “<i>Messages that require amplification through the use of ‘one message, many voices’ should be coordinated through the unified command and control system.</i>”</p>	<p>Including this new sentence will reinforce the concept of ‘one message, many voices’ used in this document.</p>	<p>✓</p> <p>Modified to: “Additionally, any key statements for which it is important to apply a ‘one message, many voices’ approach should be coordinated”</p>		
Finland	122.	3.32	<p>National authorities should have prior arrangements in place to provide information <i>also</i> to the public outside the affected area in general, and specifically to those who may be concerned for relatives in the affected zone or the possibility of contaminated goods and food products.</p>		<p>✓</p> <p>Placement of ‘also’ modified to “should also have”</p>		Improve English

Japan	123.	Para 3.34/ Line 2-3	<p>To the extent possible, bilateral and multi-lateral agreements, which include public communication, should be established at the preparedness stage to ensure public communication will be coordinated share factually correct information with neighbouring countries in a timely manner, irrespective of whether those Member States operate nuclear installations or not. An agreement at regulatory body level is also effective for cooperation, coordination and information exchange. Close relationship with neighbouring countries is essential in case of emergencies. ThisThese could be accomplished through regional networks that are prepared and exercised in advance by the communication organization in each State with the main responsibility for the communication programme during an emergency.</p>	<p>There are two reasons: (1) In case of an emergency, it is not easy to coordinate the public communication with the PIO staff in neighbouring countries. It is good to pursue ideals, but it should not be included unrealistic requirements in IAEA Safety Guide.</p> <p>(2) A certain country censors information on a daily basis. It is difficult to coordinate public communication with such a country, at normal operation time, at preparedness stage and in an emergency.</p> <p>But the utmost efforts should be made to provide correct information for neighbouring countries as soon as possible. Close cooperation, coordination and relationship among neighbouring countries are essential during a nuclear or radiological emergency.</p>		<p>✓</p> <p>First para modified as follows: "To the extent possible, bilateral and multi-lateral agreements, which include public communication, should be established at the preparedness stage to ensure public communication will be coordinated share factually correct information with neighbouring countries in a timely manner."</p>	<p><i>OK and is the other text added necessary?</i></p>
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Finland	124.	3.36	Local and, as applicable, national authorities should have arrangements in place for the warning of the affected population as required by Requirement 10 of GSR Part 7 [2]. The preparations should include availability of reliable communication channels (e.g. sirens, mobile/fixed loud speakers, local radio/TV), pre-defined and possibly recorded announcements in <u>the local languages</u> , and designated individuals who will make announcements.	Suggest including also most important foreign languages to recorded announcements. See 3.115		<p style="text-align: center;">✓</p> <p>Added: <u>“It may also be important to prepare announcements in other languages. For example, it will be necessary to ensure that such announcements are understandable to those who might be affected by an emergency at a category I or II facility, that is, members of the permanent population, transient population groups, and with consideration to the needs of special population groups (see para. 3.115). It may also be</u> important to prepare announcements in selected foreign languages, or by other means. For example it will be necessary to ensure that such announcements are understandable to members of the permanent population, transient population groups and special population groups.</p>		
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						who might be affected by an emergency at a category I or II facility (see para. 3.115).”		
USA	125.	Page 23, para 3.36, line 2 (1st sentence)	It is recommended that the 1 st sentence be revised as follows, “Local and, as applicable, national authorities should have arrangements in place for the warning of the affected population, <i>including special needs populations</i> , as required by Requirement....”	Suggested rewording for completeness and emphasis.		✓ Modified as follows: “Local and, as applicable, national authorities should have arrangements in place for warning of the public who are affected or potentially affected by a nuclear or radiological emergency, as required by Requirement 10 of GSR Part 7 [2].”		Wording more closely reflects that in GSR Part 7. Special population groups have been added to text at the end of the paragraph (in response to comment from Finland).
USA	126.	Page 23, para 3.37, lines 3-4 (2 nd sentence)	It is recommended that the 2 nd sentence be revised as follows, “Arrangements should be made to ensure that during an emergency, the public will be promptly informed about protective actions and other response actions ordered and other facts and activities related to public health and safety. Intensive <i>Extensive</i> communication efforts....”	It is recommended to clarify which word is supposed to be used in the 2 nd sentence, “Intensive” or “Extensive”.		✓ Added “and ‘extensive’ ‘efforts may also be necessary’ before ‘where long term measures...’ ”		<i>Not clear—the text refers to time-limited actions (related to evacuation)—implying ‘intensive’—and long-term measures—which implies ‘extensive’?!</i>

Finland	127.	3.38	Arrangements should be made for coordination of the local authorities with the national level authorities within the unified command and control system to avoid any contradiction in statements at the different levels. It will be imperative that local authorities' spokespersons are aware of what is being said about response actions taken and risk assessments performed at the national level <i>and vice versa</i> .	National level also has to know what is done and said at the local level.	✓	Added: "National spokespersons will also need to be aware of what is being said on a local level."	Additional sentence necessary to accommodate addition suggested by Germany.
Germany	128.	3.38	... It will be imperative that local authorities' spokespersons are aware of what is being said about response actions taken and risk assessments performed at the national level <u>as well as in neighbouring local areas</u> .	Notwithstanding the need to be informed about current information provided at state level, local PIOs also need to be informed about the communication of other local or regional authorities nearby. If, for instance, one prefecture/county/etc. openly talks about the possibility of evacuation orders to be issued soon, inhabitants in neighbouring prefectures/counties/etc. will very likely feel affected, too. This should be reflected in the local authorities' communication (e. g. by explaining that evacuation orders are not necessary due to predicted weather).	✓		
China	129.	Para.3.39 and Para.3.40	Para.3.39 and Para.3.40 popularization of science of nuclear and radiological emergency should be listed in the basis of the national basic education and the daily training and training of public safety protection.	The teenager should accept science popularization education.		✓ Following added: "It may be helpful to provide suitable and relevant information to local schools."	Specification of national education programmes is beyond the scope of IAEA and this document but the value of providing information to schoolchildren is retained.
Finland	130.	3.39		Suggest moving and combining the whole paragraph with 3.9.	✓		

USA	131.	Page 24, paras 3.39-3.41	It is recommended to move paragraphs 3.39, 3.40, and 3.41 before paragraph 3.36	Information in paragraphs 3.39, 3.40, and 3.41 pertain to preparedness. It is suggested that these paragraphs are moved up in the document, before paragraph 3.36, for completeness.	✓	3.39 moved to 3.9, in accordance with comment from Finland		
China	132.	Para.3.40	Para.3.40 is modified to: This information should be distributed to all population groups within the Emergency Planning Zone, so that to support them...or other response actions at the emergency response stage.	According to para. 3.39 above, this information in para. 3.40 actually has been informed to the public at the emergency preparedness stage. Therefore, emergency zones here should be EMERGENCY PLANNING ZONE. The function of releasing this information is "to support them in making informed decisions to comply with protective actions or other response actions AT THE EMERGENCY RESPONSE STAGE."	✓			
Canada	133.	3.42	International interagency public communication activities should be: (a) Communicated among the co-sponsoring international interagency organizations of the Joint Plan [4]; (b) Factual and based on the role and responsibilities of actions taken by the IAEA <u>relevant international organizations</u> .	Quality and Clarity: It is not clear why interagency public communications would be based solely on actions taken by IAEA	✓			
Canada	134.	3.44	If a joint message is to be released, the goal of international interagency coordination should be to achieve agreement on the content in a timely manner and to the extent possible ensure that respective press releases contain consistent messaging and information. If this is not possible, the organizations should limit their public information to their own area	Quality and Clarity: As an overarching theme of the guidance is one message many voices, the need for coordination between international organizations and states should be added.	✓			

			of competence. <u>In either case, the organizations should make all efforts to ensure alignment with public communications from the State where the emergency occurred.</u> In case an organization receives a request for assistance to respond to a nuclear or radiological incident or emergency, the organization should make every effort to obtain the requesting State's clearance before releasing related information to the media and the public.					
Pakistan	135.	3.49/1	<i>Please modify the text at mentioned location:</i> The infrastructure should be robust, diverse and redundant.	For completeness			✓	Redundant implies diverse. The addition is not necessary.
China	136.	Para.3.51, line3	"such as health physics or radiation protection experts" is modified to "such as health physics 、 radiation protection or psychological health consultant experts".	Public communication need psychological health consultant experts.		✓ Experts in fields such as health physics, radiation protection experts and psychological health, where necessary, are essential		

Pakistan	137.	3.51/2	Please modify the text at mentioned location: Sufficient personnel,, including a reasonable number of PIOs that will be adequate to cover media and public relation, Public Information Centers , internal communication, social media, online communication, content writing and media monitoring, as well as a trained spokesperson and technical briefers, such as health physics or radiation protection experts, are essential to conduct public communication activities in a timely manner and provide factually correct information to the public during a nuclear or radiological emergency.	Requirement of PIOs for Public information centers and content writing is an important consideration for managing public communication program in nuclear or radiological emergency.		✓ Text modified to address comment on 'content writing': "trained spokespersons and technical experts to help prepare briefing materials. Experts in fields..."	The section heading is 'personnel', the addition of a place (public information centres) not therefore appropriate.
Finland	138.	3.52	PIO should be part of the emergency response on call roster and on stand by 24 hours a day, 7 days a week in case an emergency or a situation with increased media interest occurs. Arrangements should be developed to ensure that there is public communication response to emergency regardless of the time of day and weekday.	Original text was not guide-level recommendation. Also, the arrangement described in the original text is not the only way to ensure adequate public communication response.	✓	<u>Modified to read – "Arrangements should be made to ensure that there is a public communication response capability available at all times (including during 24 hour day operations)".</u>	
China	139.	Merge para. 3.53 and para. 3.54.	Proposed new text is "A rotation staffing plan - using three eight-hour shifts or two twelve-hour shifts that provide 24 hours a day, 7 days a week coverage - should be prepared for the PIOs and other communication personnel".	Para. 3.54 is the specific content of the rotation plan, which should be merged with P ara. 3.53.		✓	Superseded by comment from Finland suggesting deletion of 3.53

China	140.	Page31 Footnote 7, line 5	Page31 Footnote 7, Line 5 is modified to :Those who can influence events <u>AND BE INFLUENCED</u> may effectively become interested parties ...	See the definition of Stakeholder.			✓	Definition in accordance with that in IAEA Safety Glossary
Finland	141.	3.54	The rotation plan should be prepared, for example, using three eight hour shifts or two twelve hour shifts that provide 24 hours a day, 7 days a week coverage.	This is not a guide-level recommendation. Suggest removing the paragraph.			✓	
China	142.	Before Para.3.56	Add two parts: establish the expert team and the expert database; training, publicity and consultation for the media.	Experts in various professions, such as health physics, radiation protection, public psychology or media, can provide consultation in preparation and response; The second is to enhance communication with the media.				Comment unclear ?
Germany	143.	3.61	As stipulated in para. 5.69 of Requirement 13 of GSR Part 7 [2], specific consideration should be given to arrangements that ensure redundant infrastructure in case of <u>loss of electrical power</u> and in case of emergencies caused by, during or following natural disasters such as earthquakes, floods or heavy storms as, for example, mobile communication channels might be more affected by these events than radio broadcasting.	Longer lasting power outages can occur also independently of natural disasters, e. g. due to human error or hardware malfunction. Also these cases need to be addressed and readers should be made aware of this necessity also in case they do not need to feel concerned by the possibility of a natural disaster (due to geographical situation).			✓	To address comment and to reflect the content of para 5.69 of GSR Part 7 more precisely.

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						accommodate loss of power resulting from an emergency or natural event.”		
Pakistan	144.	3.66/2	<p><i>Please modify the text at mentioned location:</i> Contracted services that could be required for delivery of certain communication activities during response (such as translation, website hosting, reservation of additional bandwidth, printing, rental of equipment, temporary help services or establishing a telephone enquiry center) should be assessed and exercised in advance to determine that the requested service can be delivered in a timely manner, if and when needed.</p>	To emphasize the importance of extra bandwidth allocation, it should be mentioned explicitly.	✓			
Japan	145.	Para 3.72/ Line 2	<p>Technical briefers should be senior subject matter experts, for instance radiation protection experts or first responders-technical experts.</p>	In case of a radiological emergency, first responders are often fire fighters or police officers. It is difficult for them to conduct a technical briefing. Technical briefers should be well-experienced experts with a lot of scientific/technical knowledge.	✓			

Finland	146.	3.78	Organizations should have clear guidelines in place regarding the official use of social media by members of the response organizations. Also, organizations should have a clear code of conduct in place regarding the private use of social media by members of the response organization, as, in a private capacity, messages could be mistaken as official when commenting on an emergency.	Already described in 2.36. Suggest removing.		✓	Reference to para 2.36 added but text retained as being important issue to cover under the heading 'social media relations'
Germany	147.	3.80	Media monitoring should provide necessary data for strategic planning, and traditional and social media relations. Media monitoring data should enable PIOs to know what concerns the public, what information is getting through and how it is being interpreted. <u>In this context, it should also provide information on current rumours, hoaxes and other forms of misinformation as well as on latent misperceptions.</u> Media monitoring should provide access to potentially valuable information for the response as real-time information e.g. from eyewitnesses or live coverage might help to improve the situation awareness and identify potential risks and problems in the field.	Insertion made in line with reason on comment no. 5 (on paragraphs 2.21 – 2.23).		✓ Following text added: "It will also help to identify misconceptions, rumours and incorrect or misleading information being circulated".	
Japan	148.	Para 3.82	Public relations activities are activities other than those conducted by traditional, online and social media	It is necessary to rewrite whole paragraph. Because para 3.82 is speaking about			<u>Any thoughts on how to revise?</u>

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			<p>relations. Public relations should coordinate and organize interested party engagement, as appropriate, to provide consistent and, as needed, additional information to the public. This should comprise two-way communication formats including newsletter services, telephone enquiry hotlines and public meetings. More guidance on the communication with interested parties in general can be found in Ref. [11].</p>	<p>public communication at normal operation time. It should more focus on arrangement for emergency.</p> <p>From the preparedness stage, it is necessary to prepare necessary reference material, equipment and resources for crisis communication. The arrangement should be written in this paragraph.</p>				
Finland	149.	3.83		Repeat of earlier issue. Suggest removing or combining with other paragraphs.	✓			Deleted
Japan	150.	Para 3.83		Move to another section, for example, "Two-way communication (paras. 2.32-2.37).			✓	Deleted on recommendation from Finland
Japan	151.	Para 3.84	<p>The focus of public relations should be set on providing background information, both generic and specific to the relevant interested parties.</p>	Because the content of this paragraph 3.84 is described in other paras and sections. For example, para 3.74, paras 3.112-3.115, etc.	✓			
Germany	152.	3.85	<p>The online communication team or team member should be responsible for disseminating the messages of the response organization via its web site. The maintenance of an emergency web site when activated for severe emergencies is also a responsibility of the online communication function. <u>The online communication team or</u></p>	Both teams should work closely together, i. a. to keep each other informed on important issues rising on social media, new content on authority's emergency website to be further posted on social media etc.	✓	Added word 'communications' at the end of additional text for clarity.		

			<u>team member should be in close contact with the team or team members responsible for social media.</u>				
Japan	153.	Para 3.88/ Line 3	An interested party is a person or company with a concern or interest in the activities and performance of an organization (see para 4.28). The public communication programme and plan should include interaction with may be related to some interested parties during emergency preparedness and response. If in case, the necessary consideration and arrangements should be made.	As stated in Paragraph 4.28, interested parties are NGO, media, operators, affected people, community, etc. It has a broad sense. The meaning of “interaction with interested parties during emergency preparedness and response” is unclear.		✓ Text: “Examples of relevant interested parties are presented in para. 4.28” added to the end of para 3.89. Text modified to: “The public communication programme and plan should include interaction with relevant interested parties during the emergency preparedness stage and include arrangements for engagement with interested parties during response, as appropriate. ”	Para 3.89 refers to ‘key interested parties’ and the cross-reference is particularly appropriate at this point. Modifications to 2nd sentence to improve clarity of English.
Russian Food Law 4.05	154.	3.88, 4.28, 4.29	It is proposed to combine the clauses in one.	In clause 3.88 the definition of “stakeholders” is given, and the relevant examples are given only on clause 4.28.		✓	Reference made to para. 4.28, following comment from Japan.

China	155.	Para. 3.91	Para. 3.91 need to add one more point, modified as follows: An analysis and identification should be carried out on the different interested parties" perceptions on radiation and radiation related risks, the communication channels that they use and their needs and priorities, <u>and the relationships or dispute among them</u> . This should include opinion surveys, face-to-face discussions and public meetings. The results of this evaluation should be incorporated in the respective public communication strategy.	The explanation is not comprehensive.		✓ Text added with the use of 'differences' rather than 'dispute'	More objective language
Germany	156.	3.91.	... This should <u>Potential measures to do so</u> include opinion surveys, face-to-face discussions and public meetings.	The use of the term "should" may be perceived as implying that the measures mentioned afterwards should be viewed as mandatory. The new wording aims to make clear that states are in general free to choose which of the measures to use.		✓ Text added: "Measures to achieve this may"	Slightly more formal language
Japan	157.	Para 3.94	Dialogue with identified interested parties should be tested regularly during exercises.	To conform to para 3.90. The wording "identified" is necessary, because interested parties has a broad meaning.	✓		
Germany	158.	3.98.	... The templates should foresee provide the possibility to enter <u>include</u> situation specific details.	Clarification.	✓		
Pakistan	159.	3.98/3	<i>Please modify the text at mentioned location:</i> Based on communication strategy, various templates should be prepared for initial press releases covering likely scenarios identified in the	To improve the quality of the document.		✓	Additional information is not necessary; 'lost' and 'orphan' sources have equivalent meaning. Provision of examples (e.g. RDD, and RED) more

			strategy, e.g. an accident at a nuclear power plant, a lost source, an orphan source or a nuclear or radiological emergency initiated by a nuclear security event, i.e. RDD, RED.				appropriate for supporting documentation rather than Safety Guide.
Germany	160.	3.103.	It is preferable to give the media the opportunity to record or broadcast live such a statement themselves. However, such a statement can also be recorded by the organization and subsequently be provided to the media, on the organization's web site and via social media in case the lead PIO deems this appropriate e.g. due to time or organizational constraints. <u>If deemed useful, live streaming of statements on various web-platforms could also be implemented.</u>	The sentence proposed should make recipients aware of the fact that web-platforms such as YouTube or Periscope do allow for live streaming.	✓		
Pakistan	161.	3.107/5	<i>Please modify the text at mentioned location:</i> This will help to develop trust among the public and increase the number of followers and to ensure that posting in an emergency will not be new of confusing for the communication team.	To fully elaborate the para	✓		
USA	162.	Page 34, para 3.107, lines 1-2 (1st sentence)	It is recommended that the 1 st sentence be revised as follows "A social media strategy should be implemented at the preparedness stage including <i>the responsible organizations</i> setting-up <i>their</i> own accounts..."	Suggested rewording for clarification.	✓		

USA	163.	Page 35, para 3.109, lines 1-2 (1st sentence)	It is recommended that the 1 st sentence be revised as follows, “Arrangements should be made to ensure the availability of telephone enquiry hotlines, <i>as well as trained operators, to answer telephone and email inquiries from the public during a nuclear or radiological emergency.</i> These arrangements should...”	This proposed change recognizes the importance of having trained operators who could handle such calls and emails during a nuclear or radiological emergency. The use of a government “Call Center” staffed with trained experts could be considered as part of the overall emergency communications plan. A flexible, scalable “Call Center” with personnel available to rapidly answer telephone calls and emails from the public could be part of the overall communications strategy	✓	<u>Modified language to – “Arrangements should be made to ensure the availability of telephone enquiry hotlines, as well as trained operators, to answer telephone inquiries from the public during a nuclear or radiological emergency. These arrangements should...”</u> <u>The paragraph deals with telephone enquiries, not emails.</u>	
Japan	164.	Para 3.111	Arrangements Consideration and efforts should be made to ensure that telephone enquiries can be answered in all relevant languages spoken within a State. Necessary arrangements should be confirmed at the preparedness stage.	Original paragraph is an ideal. Unfortunately, there is a gap between the ideal and the reality. Please imagine! How many languages are spoken in your country, including official language(s) and other languages ?		✓ Text modified to: “Arrangements should be made at the preparedness stage to ensure that, to the extent possible , telephone enquiries can be answered in all relevant languages spoken within a State.	Addresses comment with simpler language

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Germany	165.	3.119.	Arrangements should be made to facilitate the incorporation of a specific section dedicated to addressing rumours, <u>hoaxes</u> and <u>other forms of</u> misinformation on the emergency webpage. In parallel, <u>rumours-respective</u> cases should also be addressed on social media with links to the web page where factual information is contained.	Follow-up on comment no. 5 to Para.2.21.		✓	See comment on para 2.21.
Japan	166.	Para 3.120	Due to the nature of a severe emergency, the emergency webpage should have a very clear, lean design that supports usability and easy navigation. The use of colours and other design elements should be considered carefully to clearly differentiate it from any promotional content. During an emergency, information is essential to everyone, in analogy with water, food and medicine. The information accessibility on the emergency webpage should be ensured for all the public. Moreover, special care must be taken to provide information effectively for colour vision defectives.	During an emergency, information is essential for all people If the IAEA encourage/demand the use of colour and the lean design on the emergency webpage, consideration and attention should also be paid for colour vision defective persons to provide accurate information effectively and quickly.		✓ Added text: “However, it is also necessary to consider the accessibility of information to all groups of the population, including special groups such as those with impaired vision, in the design of such websites.”	Comment addressed with more objective and simpler language.
Germany	167.	3.121.	The emergency webpage should be designed in a way that it only displays officially published information on the emergency. It should not contain promotional content or content that could be considered inappropriate in	So-called responsive design is in particular important in emergency situations as in those cases many people will only have access to the internet via mobile devices.	✓	<u>3.120 modified: “Due to the nature of a severe emergency, the emergency webpage should have a very clear, lean design that supports usability and easy,</u>	

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			light of the ongoing emergency. This webpage should not be accessible when there is no emergency that warrants the activation of the emergency webpage. It should be kept as a “dark” webpage, i.e. not visible for and accessible to the public during non-emergency times. <u>The technical design of the emergency webpage should allow for it to be displayed on mobile devices such as smart phones or tablet computers.</u>		<u>navigation and is easily displayed on mobile devices.”</u>		
Finland	168.	3.124 – 3.133 and Annex II		The discussion in in 3.124 – 3.133 and in Annex II should connect to and provide a reference to Appendix III of ACTIONS TO PROTECT THE PUBLIC IN AN EMERGENCY DUE TO SEVERE CONDITIONS AT A LIGHT WATER REACTOR IAEA, VIENNA, 2013, which provides a basis for placing the health hazard in perspective.			
Finland	169.	3.124 (a)-(c)		This part repeats 1.3. Suggest removing from here as unnecessary repetition.		✓	Added cross-reference to demonstrate repetition. It provides necessary background to the content of the sub-section

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Australia	170.	3.127 (d)	The differences in the perception of the radiological health hazards among the public in comparison to that of emergency preparedness and response experts and other technical experts. It may be that the perceptions of these experts and other interested parties may not differ from those held by the public.	There may be no differences in the perception of radiological health hazards by the public in comparison to that of emergency preparedness and response experts, other technical experts and stakeholders. This can create challenging circumstances for developing consistent advice in joint communications.		✓ Added text at the end of (d): “or among different types of experts”.	To address the comment while providing concrete example of issues that need to be considered.
Finland	171.	3.128		Extremely unclear paragraph, needs complete revision. The first sentence contains unnecessarily complex languages. Two sentences starting with “however” leave open what the paragraph is trying to say.			<i>Needs to be made consistent with agreed phraseology regarding attribution</i>
Germany	172.	3.128.	... However, the prospective inference of radiation risks should continue forming a basis for measures to be applied to allow for protection and safety of the affected population even in the longer term after a nuclear or radiological emergency, as appropriate. However <u>At the same time</u> , consideration should be given to the ICRP recommendation that “it is not appropriate, for the purposes of public health planning, to calculate the hypothetical number of cases of cancer or heritable disease that might be associated with very small radiation doses received by large numbers of people over very long periods of time” [15].	To avoid irritation resulting from using “however” in two following sentences.	✓		

Japan	173.	Para 3.129/ Line 4-5	Instead it is intended to facilitate an effective communication when detailed assessments are yet not available.	Clarification is needed. The meaning of the last sentence of this paragraph is unclear. (See the left column.)				<i>I find the whole paragraph incomprehensible – needs to be updated in line with attributability agreements</i>
Japan	174.	Para 3.130/ Line 2-3	The involvement of public and other interested parties should also be consulted encouraged throughout the development process.	Improve expression.	✓			
Germany	175.	3.134.	... Respective media training simulating these situations and providing strategies to properly respond to such situations should be conducted <u>on a recurring basis.</u>	In line with respective wording in para. 3.141. The repetition seems adequate with regard to the paramount importance of repeated training.	✓			
China	176.	Para.3.135, line 1-4	Personnel, who are part of or could be part of the unified command and control system, including first responders, <u>should be provided with the knowledge of the whole arrangements to ensure they have an insight into the whole plan.</u> Other than this, they should be provided with at least basic public communication training to ensure that...	Personnel, who are part of or could be part of the unified command and control system, are the core of the whole plan. They should be updated with the information of the latest arrangements.		✓ Text modified as follows: “sufficient information to understand the communication arrangements. They should also receive at least basic training in public communication to ensure...”		To address comment and improve expression.

Japan	177.	Para 3.136	PIOs should be trained provided with an opportunities to learn on the risk contributing factors that support risk and crisis communication strategies, the construction of risk perception, social amplification of risks, the importance of interested party dialogues and interested party involvement, as well as on understanding terminology (e.g. risk vs. hazard)	Modify expression.			✓	The suggested text changes the meaning and removes emphasis on the need for proper training <i>Can we delete 'social amplification of risks' as being dealt with under the 'factors' and construction of risk perception?</i>
Japan	178.	Para 3.137 (a)	Preparation of transparent, transparent, timely, clear, factually correct, and plain language public messaging in a transparent and timely manner;	This is because the expression "transparent messaging" seems strange.	✓			?
Japan	179.	Para 3.137 (c)	Consistent messaging;	This is because all relevant organizations including response organizations should be trained in "consistent messaging" on the occasion of emergency exercises. It is not a special topic that only PIO trains particularly.	✓			<i>Tend to agree – PIO role covered by coordination</i>
Japan	180.	Para 3.138 (c) Line 1-2	Training of technical briefers and other personnel including first responders on public communication procedures relevant to in accordance with their role.	Improve expression.	✓			

Finland	181.	3.140	Spokesperson training should also include training on “what not to say” and how to avoid responding in ways that jeopardize confidential or classified information, or information that is subject to other legal restrictions. This training should be provided by a communication expert with hands-on experience in media relations.	Detail that is below the level of a safety guide.	✓			<i>Though it seems like an important point ...reinstate?</i>
Japan	182.	Para 3.143 (a)	Providing transparent, timely, clear, factually correct, and plain language public messaging in a transparent and timely manner;	This is because the expression “transparent messaging” seems strange.	✓			
Japan	183.	Para 3.144/ Line 2	Arrangements should be made for an evaluation, review and after action report following the conclusion of each drill and exercise to determine identify gaps, and to find lessons and other necessary improvements for an effective public communication component within the emergency management system.	Modify the words.		✓ “determine” replaced by “identify”		Modified word an improvement. Additional modification unnecessary.
China	184.	Para.3.145	Add two parts: Public publicity and special scientific research.	Strengthening public awareness, popularization of nuclear and radiological knowledge can increase public trust in nuclear power and trust in government. Consultation and research on public communication can help improve public communication.				Comment unclear

China	185.	Chapter 4	"Media monitoring" need to add one more point: Through media monitoring, risk assessment and early warning should been taken to possible mass incidents.					Comment unclear
Finland	186.	4.2	Public communication is part of any emergency management system and is a critical means for ensuring an effective and efficient response. Thus, the public communication group should be involved at the onset of any actual emergency, potential emergency or initiation of a response. Information on situations at facilities and activities involving nuclear or radiological material, even before an emergency has been declared, should be shared immediately with those responsible for public communication to ensure timely and consistent messaging.	Unnecessary repetition.			✓	Important point worthy of repetition related specifically to response as introduction to communications in response.
Finland	187.	4.3	The public, media and interested parties demand immediate and comprehensive information from the emergency response organization. However, in most instances all necessary information and data regarding the emergency is not available at the onset. Arrangements should be made to communicate with the public at the earliest possible stage of a response. Demonstrating, from the onset, an appropriate	Unnecessary repetition.	✓			

			response, will support efforts to build and maintain public trust. Lack of communication undermines public confidence and facilitates the spread of rumours and misinformation.				
USA	188.	Page 43, para 4.4, line 3 (2nd sentence)	It is recommended that the 2 nd sentence be revised as follows, "Public communication should be listed in an organization's priority internal notification and alarming system and the lead PIO should have immediate and continued access to senior decision makers responding as part of the unified command and control system to an emergency."	Suggested rewording for clarification.	✓		
Finland	189.	4.5	As detailed in the public communication plan (see paras 3.11-3.44) appropriate resources should be available and scalable anytime to address the situation.	Unnecessary repetition.	✓		
Finland	190.	4.7-4.9		Unnecessary repetition. Suggest removing.	?		<i>Inclined to agree?</i>
Australia	191.	4.12	This should include, but not be limited to, press releases, statements, presentations for press briefings, background information that has not been pre-produced, Q&As and video statements which should be used as appropriate by those responsible for traditional, online and social media relations, and telephone enquiry centre management.	In general, it is concerning that there is no acknowledgement of the potential for disruption to standard communication modalities either as a result of the nature of the emergency or because of difficulties providing information to displaced persons. There is also nothing concerning communities with low literacy levels, poor scientific or health literacy. The Australian Bureau of Statistics Adult Literacy and Life Skills Survey (2006)	✓		

				<p>showed that 60 per cent of Australians have less than adequate levels of literacy and health literacy, and only 6 per cent of the Australian population has 'high' health literacy levels. Around one-fifth (19%) of adults had Level 1 health literacy skills, with a further 40% having Level 2. These people had difficulty with tasks such as locating information on a bottle of medicine about the maximum number of days the medicine could be taken, or drawing a line on a container indicating where one-third would be (based on other information on the container). This is extremely relevant to the need to ensure information is accessible in formats other than text-based.</p> <p>Further, at least one major emergency in Australia, the Hazelwood mine fire, demonstrated that significant segments of the Australian public (25% in this instance) do not access traditional media sources or social media.</p>				
China	192.	Para.4.18	Media monitoring data should be used to identify rumors and other misinformation, topics of special interest to the public, <u>sentiment of the public</u> and the need for additional information.	Sentiments are useful for determining emergency response phase. They are also important for PIOs to perform appropriate communication strategy.		✓ Modified to: "topics of special or emotional interest to the public"		Clarity and objectivity
USA	193.	Page 45, para 4.20, lines 1-3 (1st sentence)	It is recommended that the 1 st sentence be revised as follows, "Internal communication should provide information to be published to all members of the response organizations; as well as also those not directly involved in the response; <i>to help inform all potentially affected about the emergency and the response at least simultaneously with informing external audiences.</i> "	Suggested rewording for clarification.		✓ Initial changes included. End of the sentence modified as follows: " about the emergency and the response at least before or simultaneously with informing at the same time that external audiences are		Address comment but retain original meaning in simpler language

						informed.		
Japan	194.	Para 4.21/ Line 3	Thus, the delay time lag between internal communication and publishing new information should not exceed 30 minutes.	Improve the wording	✓			
Japan	195.	Para 4.22/ Line 1	Public relations necessary to coordinate and organize interested party engagement with relevant organizations for emergency responses , as appropriate, and provide consistent and, as needed, additional information to the public should be established.	This is because “interested party” can be broadly interpreted. The NGO like the environmental protection group, the media, operators are also included in “interested parties,” as stated in Paragraph 4.28. In this paragraph 4.22, it is better to write a concrete expression, from the view point of crisis communication and emergency response.			✓	The heading relates to public relations – the broader interpretation therefore appropriate.
USA	196.	Page 45, para 4.22, lines 1-3 (1st sentence)	It is recommended that the 1 st sentence be revised as follows, “Public relations should be established necessary to coordinate and organize interested party engagement, as appropriate, and provide consistent and, as needed, additional information to the public should be established. ”	Suggested rewording for clarification.		✓	Modified to: “Public relations necessary activities should be established”	
Australia	197.	4.28	(j) Health professionals (k) Government officials and organisations	The list of interested parties inadvertently omits two key groups: health professionals, and government officials and organisations. Health professionals will obviously have a critical role to play in imparting information about radiological health hazards to the public and need to be well informed. It cannot be assumed that health professionals have the requisite knowledge about radiological health hazards. Communicating radiological health hazards to the public will also involve government spokespersons, usually government leaders. Whether or not	✓			

				government officials and organisations wish to directly present this information, they will have a duty of care to the public and a huge appetite for succinct and frequently updated information on the radiological health hazard.				
Finland	198.	4.28	Interested parties identified at the preparedness stage or during the response should be provided with relevant information regarding the emergency. Experience from past emergencies shows that this the interested parties/ <i>this audience/this group</i> includes but is not limited to: ...	The word “this” may refer either to the interested parties or the relevant information. It should be more clearly referred to.	✓	Modified to: “interested parties include but are not limited”		
Pakistan	199.	4.28	<i>Please modify the text at mentioned location: (j) Regulator</i>	Regulator should also be included as it is an important consideration in the list of interested parties.	✓	Modified to: “Government officials and organizations, including regulators”..		Addition suggested by Australia modified to include regulators
USA	200.	Page 46, para 4.28, line e	It is recommended that line e be revised as follows, “Community leaders, and business leaders, and as well as the scientific community, which help disseminate correct information to their respective audiences.”	Suggested rewording for clarification. There are 3 distinct groups listed in line e and each group provides information to a different audience; therefore, the message would need to be tailored to fit those audiences.	✓			
Australia	201.	4.30, 4.31, 4.32		Of relevance to Australia is the need to coordinate across national, state and territory boundaries and the complexity this brings.	✓	Added following text at the end of 4.30: “In some Member States, coordination among state, territory or federal organizations will also be necessary.”		

Canada	202.	4.36	The coordination of public communication among the participating international organizations should be following the Joint Plan [4], <u>in coordination with the response organisations to the extent feasible.</u>	Quality and Clarity: As an overarching theme of the guidance is one message many voices, the need for coordination between international organizations and states should be added.	✓		
Australia	203.	4.37		The suggested timeframe for a press release should not be lengthened. With the current degree of social media prevalence, it will be extremely difficult to avoid inadvertently being behind the news cycle.			No action appears to be necessary
Germany	204.	4.41.	Spokespersons and technical briefers should state what is known <u>and from which sources respective information stems</u> , what is not known and what is being done to find out more information. They should refrain from speculating at all times as this can harm the public's trust in the overall response and specifically in the public communication efforts.	The source of a certain piece of information is an important factor when it comes to evaluate the credibility (e. g. values stemming from state-run measuring systems vs. from private persons). It may also be in the interest of the organisation to make clear that a certain piece of information has been provided e. g. by another state or by the operator.	✓	Modified text: “,the origin of the available information,”	Simpler language
Finland	205.	4.42		Similar to the comment on 3.28. Is it meant that all the media briefings and interviews should be recorded? Is it possible to record all the statements?	✓	Modified to: ‘key statements’	Consistent with change to para 3.28.
Germany	206.	4.55.	Telephone inquiry hotlines should be established to handle questions by the public, the media and other interested parties. Telephone enquiry hotlines should be staffed sufficiently during a response to deal with the volume of calls. <u>Staff from TSOs who can answer technical questions</u>	Questions for clarification/remarks: 1. What shall “assist” mean in this context? Given the need for specific skills and training to deal with people calling in in an emergency, it is assumed that the assistance should be limited to e. g. providing technical background to those who operate the hotline. As providing this kind of information is in general one of	✓	Additional text added at the end of the para: “TSO staff can also be involved in preparing technical briefings for the staff of hotlines and as an	The role of TSOs does not seem to be dealt with elsewhere . This addition is a response to comment from Germany. It may be necessary to mention TSO role elsewhere

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			can be assigned to assist the hotline staff.	the fundamental tasks of a TSO, specifically mentioning this in the context of telephone hotlines seems dispensable. 2. If the support by TSO staff seems conceivable and useful for telephone hotlines, it may be for the same reasons useful for other communication activities (e. g. providing support in web or social media communications or in developing information material such as brochures, videos etc.). In this case it could be plausible to insert a respective general remark in the draft.		input to web, social media and other forms of public information materials.”		
Germany	207.	4.62.	When possible, maps should be used to convey information to the public and the media. However, care should be used to ensure that all maps and mapping products are clearly labeled to convey information as accurately as possible and that they use a consistent coloring scheme. Maps and mapping products, when used, should could highlight the following:	Ref. to reason on comment no. 11 (on paragraph 3.91); new wording aims to make clear that states are in general free to choose which kind of information to include.	✓			
USA	208.	Page 50, para 4.62, line b	Please define all the acronyms used in line b more thoroughly.	There are many acronyms contained in line b that should be defined more thoroughly. It is recommended that a glossary is added to this document.		✓ Acronyms defined in footnotes		Addition of glossary (additional to Nuclear Safety Glossary) against policy.
Finland	209.	4.63		This should include also other illustrative material, such as illustrations of plant situation, pictures of radiation sources, etc.		✓ Additional sentence added to the end of para 4.57: “Background information may be supported by graphics, such as illustrations of the		The section incl. 4.63 specifically deals with maps and mapping products

						plant situation or pictures of the source.”		
Argentina	210.	Para. 4.65, Line No. 3	INES is also a tool to communicate the real safety significance of an event to the public.	Accuracy. The only purpose of INES is to assess and communicate safety significance of an event, in a single number.	✓	Modified as follows: “INES is a tool to assess the safety significance of events associated with sources of radiation- It is also a tool and to communicate an the significance of such events to the public, media and technical community”		First two sentences combined to demonstrate dual objective of INES.
USA	211.	Page 51, para 4.65, lines 3-4 (4th sentence)	It is recommended that another sentence be added after the 4 th sentence as follows, “ <i>States using INES should issue a rating of the event only when the situation is stabilized.</i> ”	It is suggested to include a 4 th sentence at the end of paragraph 4.65 to emphasize an important point made in paragraph 4.67. Paragraph 4.67, lines 5-7, 3 rd sentence, states that an INES rating should be issued only when the emergency situation is stabilized. It is suggested to check the INES User’s Manual for consistency with information provided in paragraph 4.67, lines 5-7, 3 rd sentence.	✓			<i>Sinead – also need to check consistency of info. In 4.67 with INES User’s Manual</i>
Argentina	212.	Para. 4.66, line No.2	For the general public, an explanation on how a rating, presented as a single number, is reached, is important as well as an understandable explanation on what the meaning of this single number.	Add information. For the public is also (or more) important to understand what the single number means to them, regarding safety. How this INES rating responds to the question - Am I am safe?		✓ Modified as follows: “it is important to... an explain ation on how a rating, presented as a single number, is reached is important and what it means.		Simplified language – final text see text corresponding to comment from Russian Federation

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China	213.	Para.4.66	If a State decides to use INES, a difference between communication with the technical community and communication with the public should be taken into account.-- ---- Give popularization of science to public at the preparedness stage.	It is easier for the public to understand INES information in emergency situations.		✓ The text “at the preparedness state” added to the text inserted to address comment from Argentina	Simplified language – final text see text corresponding to comment from Russian Federation
Russian Federation	214.	4.66	"It is important to provide the general public with background information on the calculation of the the accident level according to the INES scale. The entire process of obtaining an integrated value should be presented to the public in a simple language"	Information on how the INES level is calculated should be provided to stakeholders as background information. For the wider public, it is precisely the assessment of the level (by analogy with the Richter scale) that is of the major interest; neither the population nor the journalists are usually inclined to delve into the details of how this assessment is obtained.		✓ Modified to: It is important to For provide the general public with background information on the calculation of the INES rating. This will include, an explaining, at the preparedness stage, ation on how a rating, presented as a single number, is reached, is important and what it means.	To address combined comments from Argentina, China and Russian Federation
Finland	215.	4.67	Experience of using INES has shown that provision of a rating, in general and particularly for low level events, can calm down public concern and media interest. For example, the rating of an event at Level 1 or Level 2 communicates that such event is, in terms of safety significance, several orders of magnitude less significant than a major accident, i.e. a Level 6 event. However, issuing an INES rating in an evolving emergency has proven to				<i>See comments in text</i>

			increase public concern, therefore States using INES should issue <i>consider issuing</i> a rating of the event only when the situation is stabilized, no further aggravation is reasonably expected and the nature and specifics of the event are understood.				
Japan	216.	Para 4.67/ Line 5	However, issuing an INES rating several times in an evolving emergency has proven to increase public concern and it is detrimental to public trust. Therefore States using INES should be encouraged to issue a rating of the event only —when the situation is stabilized, no further aggravation is reasonably expected and the nature and specifics of the event are understood. When it is necessary to provide a provisional INES rating, it is essential to explain sufficiently the reason of the necessity of the provisional rating and what kind of information is lacked to evaluate a final INES rating, in plain language.	It is desirable to avoid the use of a provisional rating, but the INES User’s Manual does not prohibit issuing it. Moreover, INES User’s Manual does not say “States using INES should issue a rating of the event <u>only</u> when the situation is stabilized.” DS475 is a IAEA document, so that the descriptions in DS475 should be matched with the contents of INES User’s Manual. In light of the lessons learned from the Fukushima Daiichi nuclear accident, it is important to explain sufficiently the reason of the necessity of the provisional rating and what kind of information is lacked to evaluate a INES rating.	✓	Additional sentence modified to: “If it becomes necessary to provide a provisional INES rating, it is essential that the reason for this necessity is explained, in plain language, and that the information needed to evaluate the final INES rating is identified.”	Simpler language
China	217.	Para.4.68, (b), line 1	<u>Tracing and monitoring the source of misinformation and respond accordingly with accurate information</u> ; Follow the development and spread of misinformation and respond accordingly.	The source of misinformation should be monitored and corrected to control the spreading of misinformation.	✓	<u>Modified to: “(b) Monitor the source and spreading of any misinformation and respond accordingly”.</u>	<i>Action?</i>

Finland	218.	4.69	<p>It is not realistic to expect to be able to correct all misinformation. To avoid the perception that uncorrected misinformation is true, disclaimers should be included when correcting misinformation. These disclaimers should make clear that information that has not been flagged as misinformation and has not been corrected by the responsible organization must not automatically be considered as correct.</p>	<p>This seems ill-advised approach. For public, such a disclaimer would read as a statement “every news that we have not approved is wrong”. Such a disclaimer is likely to do more harm than good for general trust in provided information, including the information provided by authorities.</p>	✓	I agree to delete – check with Elena		
USA	219.	Page 54, para 5.3, line 3 (1st sentence)	<p>It is recommended that line 3 be revised as follows, “...an increased demand by the public, the media and other interested parties on for information...”</p>	<p>Suggested rewording for clarity.</p>	✓			
Germany	220.	5.12.	<p>As the source situation is being brought under control and the situation is stabilizing, authorities will shift emergency response efforts to actions that support the termination of the emergency and a return to normal living conditions for affected populations, including normal social and economic activities....</p>	<p>To avoid misperception that “source” actually refers to a radiation source, i. e. a technical component.</p>	✓			

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USA	221.	Page 58, para 5.19, line 3 (1st sentence)	It is recommended that the 1 st sentence be revised as follows, “During the transition phase, the necessary transfer of responsibilities to different jurisdictions or different authorities (or to different units within an organization) in various areas is expected to happen to allow for long term management of the situation under different exposure <i>situations</i> .”	Suggested rewording for syntax.	✓			
Australia	222.	Appendix I	I.1. a) ‘Dangerous to your health’: There is a possibility of life threatening radiation effects, permanent injury, or a small possibility of a greater risk of cancer. b) ‘Possible radiation induced health effects’: There is a very small possibility of a greater risk of cancer for some members of the public, including some pregnant women and some children. c) ‘No observable radiation induced health effects’: No threat to life or risk of injury or increased likelihood of cancer is expected, even for pregnant women or children.	The descriptors for putting radiological health hazards in perspective are sensible, however the explanatory notes ought to be written as statements that could be lifted directly into public communication advice, or given in a section written for that purpose.				<i>Action?</i>
Germany	223.	Appendix I. 1.1	... a) ‘Dangerous to your health’: There is a possibility of severe deterministic effects (i.e. radiation induced health effects that are life threatening or could result in a permanent injury that reduces the quality of life) or at least a and a small possibility of a discernable increase in the incidence of	In its current form, the sentence seems implausible and possibly misleading: By using “and” it implies that two prerequisites have to be met simultaneously for a situation to be classified as “dangerous to your health”: (1) “a possibility of severe deterministic effects” <u>and</u>				<i>Action?</i>

			<p>radiation induced cancers (if the number of exposed people is more than a few hundred) to be observed if doses are received exceeding the generic criteria in Table II. 1 of Appendix II of GSR Part 7 [2].</p>	<p>(2) “ a small possibility of a discernible increase (...)”.</p> <p>Given the effective doses needed, it seems that if (1) is given, (2) will always also be given – hence setting up (2) as an additional prerequisite does not to make sense. Reading the “and” this way, readers might also come to the conclusion that a situation is not to be classified as “dangerous to your health” in case only (2) is given but effective doses will not result in (1).</p> <p>If the underlying rationale is understood correctly, “a small possibility of a discernible increase (...)” marks the lower end of this category.</p> <p>Question for clarification: The category “dangerous to your health” seems to encompass a rather broad span of scenarios – a “small possibility” of an increase in cancer will lead to the same message communicated as a situation in which a larger number of people face deadly deterministic effects. Why has this three-step approach been chosen over the approach presented in the IAEA’s EPR-NPP 2013 (“Actions to Protect the Public in an Emergency due to Severe Conditions at a Light Water Reactor” – ref. Appendix III)?</p>				
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Poland	224.	Appendix I, point I.1, letter b), first sentence	There is a very small possibility of a discernable increase in the incidence of radiation induced cancers for some members of the public (i.e. radiosensitive people , pregnant women and children) to be observed under specific circumstances if the number of exposed people is very large and if doses are received exceeding the generic criteria in Table II. 2 of Appendix II of GSR Part 7 [2].	The concept of collective dose (“my risk increase then my neighbor receives some dose”) is now being excluded from the radiation protection worldwide. Also the radiation risk for very low doses of ionizing radiation is not presented for all people.				<i>Added – but needs checking!</i>
Russian Federation	225.	I.1	a) Dangerous to your health; b) Possible radiation induced effects; c) No observable radiation induced health effects	1. People without professional knowledge will not see the difference between the first and second level, since the fundamental possibility of developing radiation cancer, however small, is perceived as a danger to health; 2. The expression "No observed radiation-induced effects" raises additional questions: no effects are observed, because they aren't any? or because of limited surveillance capabilities? For people with no professional knowledge the "no danger" is more understandable. All wordings of the "model scale" need substantial processing with the participation of experts in communication.				Action unclear – in line with comment from Australia about modifying so that text can be used directly in public communication
Australia	226.	I.4.	Receiving a radiation dose more than this (needs to be specific to the circumstances) means that there is only a small chance of you developing cancer caused by radiation.	The descriptors for putting radiological health hazards in perspective are sensible, however the explanatory notes ought to be written as statements that could be lifted directly into public communication advice, or given in a section written for that purpose.				<i>Action?</i>

Japan	227.	Reference 11	DS460: Communication and Consultation with Interested Parties by the Regulatory Body (under development). INTERNATIONAL ATOMIC ENERGY AGENCY, Communication and Consultation with Interested Parties by the Regulatory Body, IAEA, Vienna (2017).	Recently, DS460 has published as the new IAEA Safety Guide GSG-6 "Communication and Consultation with Interested Parties by the Regulatory Body."	✓			
Japan	228.	ANNEX I		Just comment. There might be better to draw a dot-line between the box "Liaison Officers to other sections" and the box "Lead PIO." Same applies to "Lead PIO" and "Spokesperson." Because the relationship among "Liaison Officers," "Lead PIO" and "Spokesperson + Technical Briefers" is unclear. "Liaison Officers" and "Lead PIO" cooperate and support "Spokesperson + Technical Briefers" together. ANNEX I should be helpful and useful to understand their relationship among the sections within a unified command and control system.				
USA	229.	Page 65, Annex II	It is recommended to replace the current table in Annex II with the tables provided in "Placing the Radiological Health Hazard in Perspective in an Emergency due to Severe Conditions at a Light Water Reactor," IAEA 2013	It is suggested to include information from this document into Annex II. Including the charts from "Placing the Radiological Health Hazard in Perspective in an Emergency due to Severe Conditions at a Light Water Reactor," IAEA 2013, would help to provide consistency among member states in using the same graph/chart to describe what is safe.				<i>Action?</i>

China	230.	Page 66	Page 66, ANNEX III "One way", added: <ul style="list-style-type: none"> schools education training The summer camp, exhibition (permanent, temporary) 				✓	Unclear how to include this (or why it is one-way)
China	231.		Page 66, ANNEX III "Two way", added: <ul style="list-style-type: none"> visit nuclear power plants 		✓	<u>Added technical visits</u>		
China	232.	Page 68	Page 68, ANNEX IV Nuclear Power Plants, added: <ul style="list-style-type: none"> - is nuclear power plant safe? - is it safe to live near a nuclear power plant? - why emergency exercise should be taken? - why nuclear power should be developed? 			✓ Added question: "is nuclear power safe and is it safe to live near a nuclear power plant?" at the end of nuclear power plants and "why emergency exercises are held" in Emergency Management		The question on development of nuclear power beyond the scope of this Safety Guide.
Poland	233.	Annex IV, line 5	Radiation dose, dose rate, units with aliquots	Units used to describe radioactivity very often are presented with aliquots. Including the explanation of aliquots in the background information would give better understanding of the units in general.			✓	Comment unclear. Have added 'and common multiples' to units.
Poland	234.	Annex IV, section "Emergency Management"	The International Nuclear and Radiological Event Scale (INES)	It might be useful for spokesperson to have some information about the INES in the background information materials.	✓			
Poland	235.	Annex IV, page 68, topic "The Basics of Radioactivity"	- natural background radiation	The specific item on natural radiation shall be added	✓			

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USA	236.	Page 70-71, Annex IV, How can you protect yourself from radiation?	It is recommended that definitions be provided for “stochastic” and “deterministic” effects.	It is suggested that the terms “deterministic” and “stochastic” be defined. It is suggested to define these terms to provide clarity to the reader/user of this document. It is suggested to include a glossary to this document.	✓			
USA	237.	Page 72, Annex V, Example 1 (1st sentence)	It is recommended that the 1 st sentence of Example 1 be revised as follows, “[Organization] is aware of [media reports; rumours on social media etc.] regarding [a situation; an emergency/incident etc.] at [location]. At the moment [organization] can neither confirm nor deny these reports is looking into this matter and will provide more information as it becomes available.”	It is suggested to revise the 1 st sentence of Example 1 to coincide with information provided in Sections 3 and 4 regarding the roles and responsibility of a PIO and the use of holding statements. In addition, this suggested revised wording provides assurances to members of the public and other interested stakeholders that an organization is taking actions to obtain information about the emergency/incident.	✓			
USA	238.	Page 72, Annex V, Example 2	It is recommended to add a 3 rd sentence to Example 2 as an empathy statement.	It is suggested to include a 3 rd sentence in Example 2 as an empathy message. Holding statements can be more effective when they fully address the situation, including a statement of concern or care, when appropriate.	?	✓	Like what — our thoughts are with all those affected? <u>Not appropriate here as it goes into detail of the event and confirms injuries or fatalities.</u>	