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**ECONOMIC COMMISSION FOR EUROPE**

Group of Experts on Monitoring of Radioactively Contaminated Scrap Metal

Second session  
Geneva, 12-14 June 2006  
Item 5 of the provisional agenda

**EXCERPTS OF GENERAL COMMENTS ON THE  
DRAFT VOLUNTARY PROTOCOL:  
INTERNATIONAL RECOMMENDATIONS TO MONITOR AND MANAGE  
RADIOACTIVE SCRAP METAL**

**Comments from Eurometaux**

“Many thanks for the submission of the documents and the offer to provide comments on the draft protocol that will be discussed during the meeting from 12 to 14 June in Geneva. We discussed the document with the waste and recycling experts of the EU Non-Ferrous Metals Industry and are supportive for the main thrust of the document. The comments we would like to make are as follows:

1. The EU Non-Ferrous Metals Industry is supportive for the main thrust of the Draft Protocol. The presence of radioactive materials in metal scraps (especially in steel scraps) is a serious problem, and the metals recycling industry sees the benefits in international coordination on preventive measures.
2. A radioactive contamination of the input streams may endanger the whole metals recycling operation. There is already a credible number of installations in the non-ferrous metals industry (especially in the EU) protecting themselves against such unintentional radioactive contamination by voluntary controls of the input streams.
3. In general, radioactive contamination can be ruled out on the basis of the nature of the material and familiarity with the source. Checks for radioactivity should only be required on a voluntary, as-needed basis and reporting requirements should be kept to the minimum.
4. There is a danger that measures which might be appropriate for large installations with high capacities (such as e.g. steel plants) would be far too bureaucratic and unwieldy (and costly)

for much smaller operations, e.g. precious metals recycling installations, where the lots are much smaller (often enough less than 1 ton of material).

5. Concerns are seen with Chapter 6.3 "Costs and Financing" and the establishment of an emergency fund. In order to cover all contaminations, the installation of such a fund would require enormous amounts from the metals recycling industry. Moreover, incentives to reduce shipments of contaminated materials are minimized once such an emergency fund is in place. Concerns are raised that companies fulfilling highest standards and monitoring their materials inputs will have to pay for free-riders. Moreover, concerns are seen that industry sectors within the metals industry only having an indirect connection to the issue are financially involved. Furthermore, all stakeholders being part of the collection, sorting and recycling process need to be involved into the development of such an emergency fund. Therefore, scrap collectors and traders also need to take their responsibility and be involved into the development of such an emergency fund."

#### **Comments of the Belgian Federal Agency for Nuclear Control**

"First of all, we would like to thank the UNECE for having assumed the task of writing this valuable document and for having taken into account most of the remarks we had expressed on the first draft of it."

#### **Comments of the Bulgarian Nuclear Regulatory Agency (NRA)**

"I would like to congratulate you and all the experts involved of the job well done in preparing the draft of the Voluntary Protocol. The Bulgarian Nuclear Regulatory Agency (NRA) has no major remarks on the proposed text."

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