

**Collection of Preliminary Comments on the application of the 2006 UNECE
Recommendations on Monitoring and Response Procedures for Radioactive Scrap
Metal**

March 2007

A. Some initial feedback from Representative of Metal Scrap Processing Industry

Thank you for the Recommendations, which are a step forward, although there is still work to be done. We are satisfied to find in the Recommendations the items indicating the clear position of the metal scrap processing industry, particularly:

Paragraph 2 of the Executive Summary the sentence:

“It may include both radioactive substances that are subject to regulatory control and radioactive substances that are outside regulatory control.”

Indeed, both types cause an alarm to be triggered and consequently are unacceptable for the smelter. Therefore, the metal scrap processor has to find the cause of any alarm no matter what radioactive material is causing it.

Paragraph 3, page 10 in the middle the sentence:

“in the German “General Terms of Metal trading” issued by the German Metal Traders Federation it is stated that “radioactively contaminated material is excluded from any delivery, even when (...)”

This is supporting our view that the metal scrap processing industry does not have a single normal client in the world that has any interest in scrap with radioactively contaminated material.

Page 11, paragraph 2:

“In relation to the controlled release of material containing very low levels of radioactive material, an international Safety Standard has recently been published by IAEA which establishes a set of levels of radionuclides, including radionuclides from NORM, for use in the practical application of the concepts of exclusion, exemption and clearance. Clearance levels have been also been defined in the European Commission’s document Radiation Protection”.

The metal industry has problems with this. For example for the radioisotope Cobalt 60 the level is 1000 Bq /kg. The experience is that even when this level is 100 Bq/kg alarms can be triggered. A smelter will only know for sure after melting and homogenising the smelt whether there were radioisotopes introduced with scrap into the melt or not.

Page 11, paragraph 2, the second to last sentence:

“However, it should be noted that even the detection of very low levels of radiation (above normal background) emanating from a shipment may indicate a significant, but shielded, source of radiation. Therefore all detected radiation above background levels in shipments should be subject to further investigation.

Unfortunately, as long as the nuclear industry is allowed to sell their problematic low level radiating scrap metals, the burden for this lies with the scrap industry. The

question remains, “What levels of radiation is safe for the public?” In our opinion the owners, makers and collectors of radioactive materials must be stopped from dumping contaminated scrap into the normal, now still extremely clean, metal scrap stream. With the dismantling of obsolete nuclear facilities on the rise, the scrap recycling industry must be protected or it will vanish.

Additional comments:

Certificates (as per annex 1) stating that a shipment has no radioactivity are unlikely to have much value. The number of gate detection system alarms is going down, while the number of grapple detection system alarms is rising.

Returning to sender is often not an option.

We regret that the “**finder pays**” policy is not mentioned

CO₂ reduction as a result of using scrap instead of ores will soon be an item of great importance.

B. Some initial feedback from the Bureau of International Recycling (BIR)

General comments

Some target actors, for instance “Owners of companies from which scrap metal shipments originate” are not clearly defined and this may cause some confusion as to responsibilities.

Comments on section: General provisions

On page 16 the provision that “The buyer of scrap metal should ensure that a “polluter pays” clause is contained in all contracts” appears unrealistic and could be removed.

On page 16 the second recommendation under costs and financing that reads “Government and industry should establish arrangements to assist owners of premises at which radioactive scrap metal or contaminated processed metal has been discovered originating from unidentifiable suppliers, in the recovery operations, the management and disposal of any radioactive waste and any necessary clean-up operations” could be improved by the following re-wording: *“Government and industry should establish arrangements to assist owners of premises where orphan sources are found or where radioactive contamination has occurred, in the management and disposal of any radioactive waste and any necessary clean-up operations.”*

Comments on section: Detection

The Recommendation on page 22 to “Owners of companies from which scrap metal shipments originate” which reads to “ensure shipments are checked by visual and administrative means for the possible presence of radioactive scrap metal” could be complemented by a recommendation that states:

“as part of the contractual provisions and in order to satisfy the general customer demand, the metal recovery and recycling industry requires from the facility selling or disposing any metal with enhanced naturally occurring radioactivity or cleared from nuclear use, to be informed of this fact and the regulatory framework under which they have been released. Such information should be conveyed with the released materials to the successive suppliers and buyers of the metal scrap – up to and including the melting unit - to allow prior informed approval by the purchaser of the material”.

On page 22 the recommendation to “Owners of companies from which scrap metal shipments originate” which reads to “provide a certificate to accompany the scrap metal shipment as evidence that the shipment has been checked for the presence of radiation” could be adjusted to reflect the fact that not all small enterprises should necessarily have to monitor their activities and provide a certificate. The proposed change would read “*provide a certificate to accompany the transboundary shipment and/or delivery to metal works as evidence that the shipment has been checked, and by what type of monitor, for the presence of radiation*”.

Comments on section: Response

The last recommendation on page 26 addressed to the national competent authority for safe transport of radioactive material, rather than focus only on *neighbouring States*, which may be too restrictive, should also include other *States*.

It is proposed to add a recommendation for States to “*facilitate the disposal, at no cost to the finder, of orphan sources of national origin where the owner cannot be found.*”

On page 24 the last recommendation to owners of major scrap yards, processing facilities and melting plants that suggests that they should “require that contracts for the supply of scrap metal include the condition that any costs associated with radioactive material discovered in shipments will be accepted by the seller unless the original owner of the radioactive source or material can be found” would most likely prevent a company from obtaining insurance, and therefore, would be best removed.

The Recommendation on page 28 for States to have a place for safe storage of radioactive material could be followed by one for States to “*facilitate the identification of orphan source owners and/or manufacturers.*”