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THE POSITION OF THE BUREAU OF INTERNATIONAL RECYCLING
ON UNWANTED RADIOACTIVITY AND SCRAP

(Prepared by P. Neenan and R. Bartley, Bureau of International Recycling)

Summary

The Bureau of International Recycling (BIR) speaks as the unified voice of the international recycling industry on a world level, promoting free-trade in non-hazardous recyclables and the increased usage of recycled goods.

In October 1998, BIR presented its "Guide to Radioactivity" to its members in order to explain the basics of radioactivity, to help determine what actions material recyclers should take and to provide an initial contact guide for summoning expert help. The Guide was promulgated together with a survey questionnaire; initial results of this survey have been collated.

BIR members do not trade in radioactive materials and do not wish to receive hazardous radioactive contaminated materials. Furthermore it is very uncommon to find this unwelcome and unwanted material. The burden of handling contaminated materials should not rest on the recycling industry alone, however, as the hazards associated with processing contaminated materials are potentially extreme, recyclers have a role to help safeguard both their workforce and subsequent customers. Some BIR members have invested in in-plant detection equipment of various types from a variety of suppliers to detect contamination from 'lost' sources or from naturally occurring radioactive materials (NORM). Strict State control on sources in use would be very welcome to limit these 'losses'. Not all BIR members are in a position to provide or operate detection equipment; therefore, BIR would welcome States providing detection and control at sea ports and at border checkpoints on railways and roads.

Some states have proposed permitting requirements for the handling of radioactive contaminated materials and have tried, inappropriately, to impose on the mainstream recycling industry, permits designed for the specialist decontamination or decommissioning industry. Current discussions on applying the transport of dangerous goods regulations would lead to unnecessary and impracticable additional restraints

to facilitating impracticable additional restraints to facilitating proper disposal. A more reasoned approach would be to draw up a binding code of practice to avoid disincentives to detection and subsequent appropriate action. Free of charge disposal routes would recognise that the recycling industry should not have to bear the costs resulting from lack of government/institutional controls.

As the mainstream recycling industry never intends to purchase or sell radioactive contaminated metallurgical scrap, provisions to prohibit purchase and sales would not be constructive, and could lead to court actions, furthering disincentives to co-operation. International understanding of the basic scientific issues needs improvement. A clear distinction must be made between the very specialised decontamination industry and the normal recycling industry that does not want to process radioactive contaminated material. There is a need to determine and harmonise the standards and measurement techniques of radiation. If a standard for "below regulatory concern" could be internationally accepted, materials certified as such, would be regarded as normal commercial materials. As detection systems become more effective and sensitive, this is the most important criteria to resolve.

The misunderstanding and misuse of information related to radioactive contaminated metallurgical scrap is of great concern because the recycling industry could suffer from adverse and unfair publicity which would damage co-operation and damage markets for recyclables. BIR members' efforts are directed at environmentally sound materials recycling and the detection of this unwanted material is providing a service and safeguard to customers and to society as a whole.

BIR promotes International co-operation on the need for a political solution to the problem of "take back" of materials rejected on grounds of radioactive contamination or, in the absence of proper treatment facilities in the Country of origin, the provision of alternate free of charge decontamination or disposal options. BIR believes that mixing the complex and scientific issue of radioactive contaminated metallurgical scrap with that of hazardous waste in the Basel Convention, could at this time unnecessarily complicate, delay and confuse both issues. In due time the Basel Convention infrastructure could facilitate a "take back" regime.