

Draft minutes, meeting no 74 held on 25 February 2020, 13:00, Wyfold Room, Victoria Lake Club, Germiston.

SUBJECT	DISCUSSION	TASKS ARISING
1 Welcome	<ul style="list-style-type: none"> Ms. van Rensburg welcomed representatives to the meeting and thanked all for making themselves available. 	
2 Present and apologies.	<p>1) The following persons attended the meeting:</p> <p>On behalf of the Metal Recyclers Association (MRA): No representation.</p> <p>On behalf of the Non-ferrous Metals Industry Association (NFMIA): No representation.</p> <p>On behalf of the Recycling Association of South Africa (RASA): No representation.</p> <p>On behalf of the Regulators / Government: Mr. D Sennanye NNR</p> <p>On behalf of the South African Institute of Foundrymen (SAIF): No representation.</p> <p>On behalf of the South African Iron and Steel Institute (SAISI): Ms. D van Rensburg Cape Gate (Chairperson) Mr. D Gangel Columbus Stainless</p> <p>In attendance: Mr. C Dednam Committee Secretariat (SAISI) Mr. A Audie Committee Secretariat (SAISI)</p> <p>2) Apologies were received from: Ms. Y Dell Scaw Metals (SAISI) Mr. P Mahlangu Armscor (Government) Mr. J Schoeman AMSA (SAISI) Mr. W Speelman NNR (Regulator) Mr. B Wild Star Recycling Company (MRA)</p>	
3 HAZCOM guideline on competition.	<ul style="list-style-type: none"> Ms. van Rensburg directed the attention of representatives to the standing agenda item regarding the HAZCOM Committee Guidelines on Competition in terms of HAZCOM Committee governance, as attached to the draft agenda, and requested all to comply. A copy of the Competition Commission publication, "Guideline on the exchange of information between competitors under the Competition Act No 89 of 1998", was made available to representatives that states that members of an industry association may legitimately exchange non-competitively sensitive information such as related to safety and health matters. 	
4 Approval of the agenda.	<ul style="list-style-type: none"> The agenda for the 74th committee meeting was approved. 	
5 Approval of the minutes.	<ul style="list-style-type: none"> The minutes of the 73rd meeting held on 19 November 2019 were approved as a true reflection of the proceedings. 	
6 Matters arising from the previous minutes not dealt with elsewhere:		
6.1 Necsa issuing invoices for collection of orphaned radioactive sources.	<ul style="list-style-type: none"> It was noted that Necsa has not responded to the letter dated 6 December 2019 from the secretariat on the status of attempts by Necsa to meet with the Department of Health (DoH) on the issue of ultimate responsibility for orphaned radioactive sources. A media statement by the Department of Energy on the appointment of the new Necsa board members on 21 January 2020 following the resignation of the previous board members, was made available to committee representatives. It was also noted that the general media reported that the ability of Necsa to pay salaries to employees at the end of January 2020 was within doubt. The letter dated 6 December 2019 by the SAISI Secretariat addressed to Necsa was made available to representatives. Ms. van Rensburg remarked that experience at Cape Gate it appeared that the rate charged by Necsa for the collection of sources differed case by case and that there was no single flat rate applied for the service. 	
6.2 SAPS Explosives Section and Necsa invoicing for	<ul style="list-style-type: none"> It was noted that at the previous Committee meeting Lt. Col. Alberts reported that the previous arrangement between the SAPS and Necsa, in terms of the removal of radioactive sources, appears not to be in place anymore and that the matter of Necsa invoicing for the collection of sources was escalated to SAPS Explosives Head Office. 	Secretariat to inquire on status of feedback to

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collection of sources.	<ul style="list-style-type: none"> It was agreed that the Secretariat inquire from Lt. Col. Alberts if communication with Necsa has been established in this regard. 	SAPS by Necsa.
6.3 Armscor - directive from Necsa on radioactive aircraft engine parts.	<ul style="list-style-type: none"> It was noted that at the previous meeting Mr. Mahlangu reported that Armscor was awaiting an opportunity to meet onsite with Necsa in order to obtain advise on the manner in which the aircraft engine parts could be disposed of. 	
6.4 National Radioactive Waste Disposal Institute (NRWDI).	<ul style="list-style-type: none"> It was noted from the latest NRWDI Strategic Plan that NRWDI would liaise with all role players to mitigate radiation risks by implementing sustainable disposal options for disused sealed radioactive sources. It was agreed that the HAZCOM Secretariat sensitise NRWDI on the objectives of HAZCOM as well as the concern regarding the ethical disposal of orphaned sources since Necsa introduced a fee structure for the collection of orphaned sources. 	HAZCOM Secretariat to sensitise NRWDI on the objectives and concerns of HAZCOM.
6.5 Protocol on levels of responsibilities and controls regarding RA incidents.	<ul style="list-style-type: none"> It was noted that the section for the Radiation Control department on the website of the South African Health Products Regulating Authority (SAHPRA) was updated to include actions for "Emergencies involving radioactive sources or material". It was noted that the mentioned guide listed actions for in case of loss or theft, sources found at scrap metal processing plants, fire and accidents, transport incidents and sources confiscated at ports, and representatives were presented with the guide. 	
6.6 Procedures regarding NORM incidents.	<ul style="list-style-type: none"> Mr. Sennanye reported that the NNR was awaiting feedback from the minister of the Department of Energy (DoE) on the earlier submission made by the NNR to the DoE to allow Necsa to store NORM recycled metal on behalf of the NNR. Ms. van Rensburg stated that the situation in terms of re-directed NORM contaminated loads improved somewhat since Scaw Metals commenced to accept loads under certain prescribed conditions. Ms. van Rensburg said that the NNR would assist the industry with re-directing NORM loads should the NORM contaminated load not be acceptable to Scaw Metals. 	
6.7 Necsa Emergency Call Centre (ECC) and Hotline contact number.	<ul style="list-style-type: none"> Representatives noted the agreed upon resolution of calling the SAPS Explosives Section as first responders to radiation incidents of manmade sources and that the SAPS would in turn contact the Necsa ECC. 	
6.8 General radiation detection procedures.	<ul style="list-style-type: none"> It was noted that an amendment was made to the "General Radiation Detection Procedures" brochure to the effect of amending the post description for Ms. Snyman to Acting Director at SAHPRA. Ms. van Rensburg remarked that the brochure was widely on display in the industry at weighbridges. 	
6.9 Register - Reporting hazardous incidents to central register.	<ul style="list-style-type: none"> It was noted that a Cs – 137 source was detected on 30 November 2019 at Cape Gate and that the source was collected by Necsa on 10 December 2019. It was noted that a source was detected on 6 January 2020 at Cape Gate and that Necsa collected the source only on 27 January 2020. Ms. van Rensburg reported that the item detected on 6 January 2020 could not be identified in terms of the isotope present due to the particularly wide spectrum of readings detected by the identifier. Ms. van Rensburg said that the objective of education by the HAZCOM Committee was extremely important as this particular item detected was unrecognisable by observation only in a 30 tonne load that had to be searched and was only part of a larger item that was most probably still somewhere undetected in the metal recycling stream. It was noted that the secretariat did not receive any reports on the detection of orphaned radioactive sources during the time period since the previous HAZCOM committee meeting. It was noted that Cape Gate reported 3 NORM incidents and Columbus Stainless 6 NORM incidents in the time period since the previous HAZCOM Committee meeting. 	

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6.10 Additional measures to prevent the theft of radioactive sources in the first place.	<ul style="list-style-type: none"> It was noted from the SAHPRA website that form RN001 MRS as from 2020 requires monthly reporting on sealed radionuclides to the Directorate, Radiation Control. <i>(Secretary's note: In an email message to the Secretariat Ms Snyman from SAHPRA confirmed that form RN001 MRS does not in any way relate to the recycling industry.)</i> It was noted from the SAHPRA annual report of 2018/2019 that many licensees do not submit annual returns anymore and due to the critical staff shortage, this could not be followed up, in addition, the database was inaccurate. 	
6.11 Training initiative and awareness campaigns at plant operator level.	<ul style="list-style-type: none"> Mr. Sennanye reported that the NNR remained hopeful to host a training initiative and that the arrangements would still be communicated as such to the HAZCOM Secretariat. It was agreed that the HAZCOM Committee would promote this NNR training exercise and that the promotion of the NNR initiative be set as an objective for HAZCOM during 2020. 	
6.12 HAZCOM Committee in terms of radiation awareness in the metal recycling industry.	<ul style="list-style-type: none"> Ms. van Rensburg stressed the importance of awareness in terms of the risks posed by radiation and emphasised that the HAZCOM Committee acted as a vehicle for raising awareness and in that sense, the posters and brochures made available by the HAZCOM Committee were of value. Ms. van Rensburg said that the Committee has come a long way since the inception of the Committee and achieved the cooperation of the regulators, namely the NNR and the DoH, in understanding responsibilities and the manner in which radioactive material was handled. 	
7 New matters since the previous meeting.		
7.1 Temporary storage of orphaned sources on unlicensed premises.	<ul style="list-style-type: none"> Per request from Cape Gate at the previous committee meeting the Secretariat consulted the IAEA and DoH on storage procedures for RA sources. The storage requirements as set out in the DoH's "Code of Practice for the safe use of industrial gauges containing radioactive sources" was made available to representatives, however, the opinion was that these requirements related to an authority holder and not orphaned sources. Ms. van Rensburg remarked that the Waste Management License issued for Cape Gate clearly prohibited radioactive waste from being accepted on site. 	
7.2 SAISI Council instruction to committees to set objectives for 2020.	<ul style="list-style-type: none"> It was noted that the SAISI Council instructed all committees to identify at least 2 objectives for 2020 with priorities and deliverables that would be measurable. Mr. Dednam suggested that a request for comment be circulated to the representing associations' members in terms of agreement on setting objectives for the Committee. It was agreed that promotion of the NNR training initiative as well as establishing cooperation with NRWDI be proposed as the two objectives of HAZCOM for 2020. 	Secretariat request comment on proposed objectives set out for 2020.
8 General		
8.1 Election of committee chairperson for 2020.	<ul style="list-style-type: none"> It was agreed that the matter of election of chairperson be postponed until the meeting scheduled for 19 May 2020. 	
9 Date of next meeting.	<ul style="list-style-type: none"> It was agreed that the next meeting of the HAZCOM Committee would be scheduled for 13:00, Tuesday, 19 May 2020. For the remainder of the 2020, 25 August 2020 and 24 November 2020 would be proposed. Ms. van Rensburg stated that it was also an option to schedule the meetings with a 6 months' interval and requested that the Secretariat circulate a request in this regard amongst the Committee representatives. 	Secretariat to request feedback on scheduling bi-annual meetings.
10 Adjournment	<ul style="list-style-type: none"> Being there no further business, Ms. van Rensburg thanked representatives for their attendance and contributions to the meeting. The committee attendees extended gratitude to Ms. van Rensburg for the valued contribution to the HAZCOM Committee activities since the inception of the HAZCOM Committee and wished her well in her future endeavours. The meeting was adjourned at 14:08. 	