

Draft minutes, meeting no 75 held on 19 May 2020 @ 13:00 via online Zoom meeting.

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 during this trying environment. Ms. van Rensburg agreed to chair this meeting and said that the committee was striving to rotate the chair amongst the representative associations. 	
2 Present and apologies.	<p>1)The following persons attended the meeting: On behalf of the Metal Recyclers Association (MRA): Mr. B Wild Star Recycling Company On behalf of the Non-ferrous Metals Industry Association (NFMIA): No representation. On behalf of the Recycling Association of South Africa (RASA): No representation. On behalf of the Regulators / Government: Mr. D Sennanye NNR On behalf of the South African Institute of Foundrymen (SAIF): No representation. On behalf of the South African Iron and Steel Institute (SAISI): Ms. D van Rensburg Cape Gate (Chairperson) Mr. D Gangel Columbus Stainless Ms. C Stevens Scaw Metals Mr. L Swanepoel Scaw Metals 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. C Bezuidenhout Scaw Metals (SAISI) Mr. S Pheto NNR</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. 	
4 Approval of the agenda.	<ul style="list-style-type: none"> The agenda for the 75th committee meeting was approved. 	
5 Approval of the minutes.	<ul style="list-style-type: none"> The minutes of the 74th meeting held on 25 February 2020 were approved as a true reflection of the proceedings following corrections to: <ul style="list-style-type: none"> - Page 1, point 6.1, 5th bullet: "...remarked that from experience at Cape Gate..." - Page 2, point 6.9, 5th bullet: "...did not receive any reports on stolen or lost radioactive sources ...". 	
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"> Ms. van Rensburg stated that it was apparent from the current situation that each company would have to decide upon themselves how to arrange for the removal of orphaned radioactive sources from their premises now that Necsa has introduced a permanent collection fee for orphaned sources. 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. It was noted from general media reporting that the Department of Energy recently appointed a new Necsa board and that the ability of Necsa to pay salaries to employees was also within doubt. 	
6.2 National Radioactive Waste Disposal Institute (NRWDI).	<ul style="list-style-type: none"> It was noted that the secretariat received a response by email on 6 May 2020 from Mr. Beyleveld at NRWDI following a request for cooperation with HAZCOM in terms of sustainable and ethical disposal options for orphaned sealed radioactive sources from the metal recycling industry since Necsa introduced a fee structure for the collection of orphaned sources. In the said email response Mr Beyleveld states that: "in terms of cooperation, it is important to continue with the current arrangements and protocols with Necsa to collect 	

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	<p>and store orphaned sources. Once an endpoint for disused sealed radioactive sources has been established, NRWDI will liaise with Necsa for the disposal of such sources. It must be emphasised that Necsa will be responsible for the disposal cost of disused sealed radioactive sources received from waste generators”.</p> <ul style="list-style-type: none"> • In addition, Mr. Beyleveld stated in said email that: “it is envisaged that a borehole disposal facility for disused sealed radioactive sources would only be available in 2025”. • Ms. van Rensburg requested that said email response from NRWDI be circulated by the secretariat to HAZCOM participants. • <i>(Secretary’s note: Following circulation of the NRWDI email response Mr. Tselane from Necsa replied by email as follows: “I have noted the email below and will provide a response accordingly in 3 months’ time”).</i> • Mr. Sennanye said that the HAZCOM participants’ uncertainty could be addressed should direction be provided by SAHPRA on the ultimate responsibility for orphaned radioactive sources. • Mr. Gangel said that the uncertainty and risks experienced by the metal recycling industry, and highlighted in the HAZCOM letter to Necsa in December 2019, were to remain unresolved should the current situation continue. 	<p>Secretariat to circulate email response by NRWDI.</p> <p>Mr. Tselane to provide a response by Necsa.</p>
6.3 SAPS Explosives Section and Necsa invoicing for collection of sources.	<ul style="list-style-type: none"> • It was noted that at previous Committee meetings 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. • It was noted that it was unknown at this stage if communication between SAPS and Necsa has been established in this regard. 	Secretariat to inquire on status of feedback to SAPS by Necsa.
6.4 Armscor - directive from Necsa on radioactive aircraft engine parts.	<ul style="list-style-type: none"> • It was noted that at a 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. • Mr. Sennanye reported that Armscor has not met with the NNR in this regard and said that Armscor / SAAF does have a Certificate of Registration (COR) that prescribed the conditions for handling of radioactive material on site. 	Secretariat to inquire on status of Armscor & Necsa engagement.
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 sources found at scrap metal processing plants and prescribed that the local SAPS Explosives Unit as well as the Necsa Emergency Control Centre should be contacted. 	
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 system in terms of re-directed NORM contaminated loads to Scaw Metals, under the directive of the NNR, was working fine as Scaw Metals accepted loads under certain prescribed conditions. • Mr. Swanepoel stated that Scaw Metals normally accepted these re-directing NORM loads with fairly low radioactivity levels, however, loads with higher radioactivity readings would not be accepted. 	
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 no amendments were made to the “General Radiation Detection Procedures” brochure since the previous committee meeting. 	
6.9 Register - Reporting hazardous incidents to central	<ul style="list-style-type: none"> • It was noted that no reports were received at the secretariat of the detection of orphaned sealed radioactive sources in the metal recycling industry since the previous committee meeting. • It was noted that the secretariat did not receive any reports from SAHPRA on lost or 	

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register.	<p>stolen radioactive sources during the time period since the previous HAZCOM committee meeting.</p> <ul style="list-style-type: none"> It was noted that Cape Gate reported 7 NORM incidents and Columbus Stainless 1 NORM incidents in the time period since the previous HAZCOM Committee meeting, bringing the total reported incidents to 17 for 2020 to date, compared with 27 for 2019. 	
6.10 Additional measures to prevent the theft of radioactive sources in the first place.	<ul style="list-style-type: none"> Ms. van Rensburg stated that license holders were required to report annually to SAHPRA on the sealed radiation sources on their sites. 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. It was noted that in an email message dated 4 May 2020 to the secretariat Ms Snyman from SAHPRA stated that form RN001 MRS does not in any way relate to the recycling industry. 	
6.11 Training initiative and awareness campaigns at plant operator level.	<ul style="list-style-type: none"> Mr. Sennanye reported that the interactive training initiative being prepared by the NNR for the metal recycling industry was at this stage delayed by COVID-19 and that the new arrangements would be communicated at a later stage to the HAZCOM Secretariat. 	
6.12 HAZCOM Committee in terms of radiation awareness in the metal recycling industry.	<ul style="list-style-type: none"> Ms. van Rensburg said that the HAZCOM Committee raised awareness in the entire industry in terms of the risks posed by radiation and other hazardous items to the metal recycling industry. 	
6.13 Temporary storage of orphaned sources on unlicensed premises.	<ul style="list-style-type: none"> It was noted that the storage requirements as set out in the DoH's "Code of Practice for the safe use of industrial gauges containing radioactive sources" probably related to licensed authority holders and not to orphaned sources on site awaiting removal by Necsa. Mr. Sennanye said that the NNR would advise that responsible corporate citizens should isolate radiated material in a safe area until the material in question could be removed as from site as soon as possible. Mr. Gangel said that as responsible corporate citizens the industry co-operated with the regulators , however, the temporary storage of radiated material on site presented a grey area between the material the industry could allow on site and the material the industry attempted to keep out of the public domain for safety reasons. Mr. Gangel said that the industry presided in the public domain and was not the registered license holders of these orphaned sources. Ms. van Rensburg remarked that the Waste Management License issued for Cape Gate prohibited radioactive waste from being accepted on site. 	Secretariat to seek guidance from SAHPRA on matter.
6.14 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 the SAISI committees to identify at least 2 objectives for 2020 with priorities and deliverables that would be measurable. Mr. Gangel said that the objective to open a communication channel with NRWDI was largely achieved. Mr. Dednam said that the HAZCOM Committee was engaged with various initiatives. It was noted that the promotion of the NNR training initiative was also proposed as an objective of the HAZCOM committee. 	
7 New matters since the previous meeting.		
7.1	No matters were raised.	
8 General		
8.1 Election of committee chairperson.	<ul style="list-style-type: none"> It was noted that nominations for the chairmanship of the committee was received by the secretariat for Ms. Dell from Scaw Metals and Mr. Gangel from Columbus Stainless Steel. Mr. Gangel accepted the nomination and indicated that he was available to chair the meeting and subsequently the delegates attending agreed on the election of Mr. Gangel as chair of the committee for the next 12-month period. Mr. Gangel accepted the election as chair and extended gratitude to Ms. van Rensburg for 	

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	the valued contribution by her to the HAZCOM Committee activities since the inception of the HAZCOM Committee.	
8.2 Communication with the organs of state.	<ul style="list-style-type: none">• Mr. Sennanye suggested that a meeting be scheduled with SAHPRA in order to ascertain which responsibilities now fell within SAHPRA and those responsibilities that were still with the DOH.• Mr. Sennanye raised a suggestion with regard to outstanding agenda items which are required to be addressed or need a response from either DoH, SAHPRA, NNR, NECSA, NWRDI or DME, since these items have been carried over a long time, that HAZCOM need to follow-up these items to a point where it is known exactly what the problem is, why they are not responded to, is it a national legislative or policy issue etc, so that HAZCOM is able to know when to stop making follow-up on these issues.	Secretariat to request SAHPRA to meet with HAZCOM.
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, 25 August 2020 via an online Zoom meeting.• For the remainder of the 2020, 24 November 2020 would be proposed.	
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 meeting was adjourned at 14:02.	