



VITSAN

MÜMESSİLLİK VE MÜŞAVİRLİK A.Ş.

P & I CLUB CORRESPONDENTS

Date: 04 December 2024

"CIRCULAR TO ALL P&I CLUBS"

Subject: Important Circular for Vessels Carrying Steel Scrap Cargo to Türkiye

As is well known, Türkiye exports steel products to a large number of countries worldwide and, to meet production demands, imports steel scrap to manufacture finished or semi-finished steel products. Scrap cargo consists of various types of steel from various sectors, typically comprising materials that are no longer in use and have been disposed of.

As per relevant import regulations, during cargo discharge operations, scrap cargo loaded onto trucks is checked using fixed radioactive detectors to ensure the cargo's radioactivity levels comply with standards. The fixed detectors are directly connected to the Nuclear Regulatory Authority (hereinafter will be mentioned as NRA) in Ankara, which oversees the entrance procedures of radioactive materials into Turkey in coordination with the Customs Authorities.

In one of our recent experiences, a piece of cargo was found to be contaminated with radioactivity, triggering a warning signal from the radioactive detectors. The second mandatory measurements via portable detectors were made by authorized institution appointed by port / cargo receivers and Nuclear Regulatory Authority (NRA) was subsequently informed as necessary, and the contaminated piece was separated and secured at the open area within the terminal, awaiting the NRA's comments.

The NRA reviewed the cargo documents and noted that the non-radioactivity certificate was issued by a company not authorized by the NRA. They have requested from the Customs Authority that the relevant piece of cargo be returned to its origin. As per regulations, the entrance of a radioactive scrap cargo is not permitted if the authorities are not presented with a non-radioactivity certificate issued by company authorized by the NRA. Consequently, return-to-origin procedures must be initiated by the importer.

Although the importer is responsible for arranging the return of the radioactive cargo to its origin, in practice, the importer proceeds with loading the radioactive piece back onto the vessel, regardless of whether the vessel's next destination is the origin country or not, as an easier solution. This course of action is effectively supported and imposed on the vessel by Customs Authorities, additionally the Harbour Master does not permit the vessel's departure unless the matter has been solved, i.e. till the relevant piece of cargo is loaded back on board or the importer confirms that the necessary arrangements for the cargo to be sent to its origin have been made.

VM-FRM087/00-05/18

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Considering the above, the importance of radioactivity measurements at load port has increased and should be carried out with due diligence. If practicable and cost effective, we strongly recommend that the Owners / Charterers verify whether the non-radioactivity certificates provided by the Shippers at load port have been issued by a company authorized by the Turkish Nuclear Regulatory Authority. You may reach the authorized companies list from the following link:

<https://www.ndk.gov.tr/yetkilendirilmis-kuruluslar-radyasyondan-korunma>
(the webpage is only available in Turkish language)

If the non-radioactivity certificate is not issued by any of above-mentioned authorized company, in order to prevent the possible loss to the Owners with the radioactive scrap piece on board, we suggest that the terms of the charterparties prior to entering any agreement should be reviewed and the Members should seek the advice of their Club accordingly.

In addition to the above, we kindly remind you that the final decision lies at the discretion of the authorities, and having a surveyor present during the vessel's operation can be considered a precautionary measure to ensure that the Master is thoroughly assisted. As a P&I correspondent, our main goal will always be that the radioactive material should not be loaded back on board as it will not be convenient nor cost effective for the Member. However if disposed in Turkiye in accordance with the NRA directive it will be cost effective and less administrative troubles for Member to instead of finding another country to accept the disposal of radioactive material.

We will keep closely following the matter and will let you know the further developments and any change on the regulation in force.

Submitted for your kind info and for guidance purposes only.

Please contact us if you have any further queries and if you / your members need our assistance, we are always at your disposal.

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Best regards,

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