

## Oral 2.7

### TOWARDS AN EVIDENCE-BASED SCORE-CARD FOR ALIGNING RISK MANAGEMENT AND SUSTAINABILITY GOALS FOR ESSENTIAL NORM INDUSTRIES: CASE STUDY - PHOSPHATES

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Approaches to regulating NORM industries risk suffering blight from over-conservative methodologies, whether based on worst-case models, extreme event scenarios or unmediated application of the precautionary principle: the outcome can be significant over-estimation of risk and a consequent penalty on both producers and consumers in terms of access to and affordability of the intermediate and end products those industries provide. In particular, for historical reasons derived perhaps from the potentially distracting regulatory focus on what is usually trace radioactivity in products and by-products containing NORM, there is a damaging tendency to seek risk-management models and best practices from nuclear industries in general rather than from those sectors to which the end-products of NORM industries are specifically aligned. This risk is particularly visible in the phosphate sector, an industry now pivotal to long-term security and sustainability in both food production and plant-based, renewable energy supply. Premised on a companion paper which sets out the theory of “constructive regulation” (IRPA 12), this paper proposes the use of an evidence-based score-carding system to ensure the future alignment of risk management and sustainability goals for NORM industries, starting with phosphates. The score-card elements are broken out into three primary categories along the lines defined in the concept of triple bottom line, economic, social and environmental. The question is put as to what constructive role regulation and best practices can play in ensuring that the outcome of the regulatory process is the preservation and enhancement of the capability of these industries to deliver long-term sustainable returns to the customers and stakeholders who depend on them. Score-carding will facilitate transparent, objective decision-making and effective performance monitoring both short and long-term as measured against triple-bottom line expectations.