

**DATE:** December 8, 2020

**TO:** State Administration for Market Regulation  
National Standardization Management Committee  
National Pig Iron and Ferroalloy Standardization Technical Committee  
Beijing  
China

and

China Iron & Steel Association  
Beijing  
China

**REFERENCE:** Comments to Draft GB/T standards for “recycled steel raw materials”

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The Institute of Scrap Recycling Industries (ISRI) welcomes the opportunity to provide comments on the Government’s draft GB/T standards for “recycled steel raw materials.” We commend the Government for the work undertaken to develop these draft standards, and we hope our comments will ensure appropriate compliance with the standards and the continued import of recycled raw materials for use by manufacturers in China.

### 3.13 Shredding

“Crushing” and “shredding” are very different operations; “crushing” does not adequately explain “shredding”.

- They require different equipment and processes;
- They result in different material outputs;
- They are used differently depending on the customer’s specifications.

We recommend the following explanation of shredding:

*A highly mechanized process of fragmentizing automobiles, appliances, scrap steel and other large recyclable materials into smaller, usable recycled commodities.*

### 4.1 Processing Methods, Figures 1-6

For the processing methods diagramed in figures 1-6, we are confused by the first stage being called “wool” [毛料]. This is not a common term in the global steel industry and causes confusion as to what are acceptable starting points for “recycled steel raw materials.” We recommend using the term “steel scrap” [废钢].

### 4.2 Category Name and Code

We recommend that an additional column be added to Table 1 referencing the ISRI Specification code for each product. This will ensure proper compliance with the regulations set out in these standards. We have provided those codes for you:

GRADE	ISRI Code	ISRI DESCRIPTION
HRS101	200	No. 1 heavy melting steel
	201	No. 1 heavy melting steel 3 feet x 18 inches
	202	No. 1 heavy melting steel 5 feet x 18 inches
	204	No. 2 heavy melting steel
	205	No. 2 heavy melting steel 3 feet x 18 inches
	206	No. 2 heavy melting steel 5 feet x 18 inches
	231	Plate and structural steel, 5 feet and under
	232	Plate and structural steel, 5 feet and under
	233	Cast steel
	252	Cupola cast
	253	Charging box cast
	254	Heavy breakable cast
	261	Drop broken machinery cast
		Railroad ferrous scrap 2 thru 45A
HRS102	229	Billet, bloom and forge crops
	230	Bar crops and plate scrap
	241	Chargeable ingots and ingot butts
	251	Heavy turnings
MRS201	236	Cut structural and plate scrap, 3 feet and under
	237	Cut structural and plate scrap, 2 feet and under
	242	Foundry steel, 2 feet and under
	257	Mixed cast
MRS202	234	Punchings and plate scrap
LRS301	238	Cut structural and plate scrap, 1 foot and under
	243	Foundry steel, 1 foot and under
LRS302	219	Machine shop turnings
	220	Machine shop turnings and iron borings
	221	Shoveling turnings
SRS401	210	Shredded scrap
	211	Shredded scrap
SRS402	212	Shredded clippings
SRS403	243B	Lower residual, ductil quality shredded clips
SRS404	261	Drop broken machinery cast
BRS501	207	No. 1 busheling
	208	No. 1 bundles
	209	No. 2 bundles
	213	Steel can bundles
	214	No. 3 bundles
	235	Electric furnace bundles
	239	Silicon busheling
	250	Silicon bundles
BRS502	217	Bundled No. 1 steel
	218	Bundled No. 2 steel

BRS503	216	Terne plate bundles
	240	Silicon clippings
Stainless-RS601	Sabot	Stainless Steel Scrap
	Ultra	Stainless Steel Turnings
Stainless-RS602	Sabot	Stainless Steel Scrap
	Ultra	Stainless Steel Turnings

8.2 Quality Certificate

Please provide clarification on who may provide the “radioactive inspection material certificate,” whether it should be provided by the supplier or by a third party.

Again, we thank you for the opportunity to provide these comments. Please let me know if there is any additional information we can provide.

Sincerely,



Adina Renee Adler  
Vice President of Advocacy