ACT GOVERNMENT

STRATEGIC PLAN

CONTAMINATED

SITES

MANAGEMENT
STRATEGIC PLAN

CONTAMINATED SITES MANAGEMENT

August 1995

Department of Urban Services
Environment and Land Bureau
ACT Government
<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Acceptable risk site</strong></td>
<td>Where, although there is contamination, continuation of existing use poses no threat to human health and the environment is not at risk. (This is equivalent to the &quot;non-risk site&quot; of the ANZECC Guidelines.)</td>
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<tr>
<td><strong>Contaminated site</strong></td>
<td>A site at which a hazardous substance occurs at concentrations above background levels and where assessment indicates it poses, or is likely to pose, an immediate or long term hazard to human health or the environment. (Primary contamination site - see below.)</td>
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<tr>
<td><strong>Contamination</strong></td>
<td>The presence in the environment of certain substances at a concentration which may or may not actually be harmful, at that concentration, to health or the environment.</td>
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<tr>
<td><strong>Background level</strong></td>
<td>Ambient level of a hazardous substance in the local area of the site under consideration.</td>
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<tr>
<td><strong>Manager of land</strong></td>
<td>A person, other than a resident, (including the Government and landlords) who controls a block of land for some activity or industry other than housing.</td>
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<tr>
<td><strong>Occupier of land</strong></td>
<td>A person who is a permanent or part-time resident on a block of land primarily used for residential purposes.</td>
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<td><strong>Orphan site</strong></td>
<td>A site where the person who caused the contamination (i.e. the polluter) is either unidentifiable or cannot be made to pay; and the person in control of the premises cannot be made to pay, or special circumstances apply; or the site is abandoned.</td>
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<tr>
<td><strong>Polluter Pays Principle</strong></td>
<td>Those who generate contamination and waste should bear the cost of containment, avoidance or abatement wherever the site is not an orphan site.</td>
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<td><strong>Primary contamination site</strong></td>
<td>The place where a potentially contaminating activity was undertaken.</td>
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<tr>
<td><strong>Remediation</strong></td>
<td>Moderation of the actual or possible adverse health or environmental impacts of a contaminated site. This may vary from alleviating the effects without destroying or removing the contaminants to complete clean up of the site.</td>
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<tr>
<td><strong>Risk sites</strong></td>
<td>Where human health is at risk, either on-site or off-site, and/or the environment is at risk because of contaminant migration.</td>
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INTRODUCTION

The purpose of this Strategic Plan is to set out the Government's broad policy approach to the management of contaminated land.

The views of community groups and individuals who responded to the draft document released by the previous Government, which was available for general public comment, have been considered and included where practicable. A list of respondents is at Appendix 1.

The Government's primary concern is to safeguard the high quality of the ACT community's social and environmental health. The Strategic Plan provides an integrated approach to planning, management and necessary remediation of contaminated sites.

This Plan is based on the Australian and New Zealand Guidelines for the Assessment and Management of Contaminated Sites (the "Guidelines"), released by the Australian and New Zealand Environment and Conservation Council (ANZECC) and the National Health and Medical Research Council (NHMRC).

Evaluation and review

The Strategic Plan will require evaluation and review after three years of operation. Evaluations will be made against performance indicators as detailed in applicable departmental Corporate Plans and the program set out in Appendix 2.

Background

The ACT has dealt with contaminated sites on an individual basis. In the absence of specific legislation, the provisions of the Water Pollution Act 1984, the Air Pollution Act 1984 and the Land (Planning and Environment) Act 1991 have been used to address individual sites. The Strategic Plan is designed to replace this case-by-case arrangement with an integrated approach which itself will be consistent with proposed new integrated environment protection legislation.
Funding for clean-ups

In general, the Government’s position is that the polluter of land should pay clean-up costs wherever possible and similarly, where a lessee wishes to change the use of land to one which requires a higher standard of clean-up, the lessee would meet these costs. The Government proposes legislation to ensure that the community does not pay for investigations and remediation where the polluter is identifiable and solvent. However, in many cases, there is no longer an identifiable polluter, or the polluter is insolvent. Pending the introduction of legislation to deal with contaminated sites, the Government intends investigating all sites where human health or the environment may be at risk at its own expense.

The Government will also take responsibility for remediation of sites in residential areas where there is no identifiable polluter.

In recognition of the impacts on physical and emotional well-being of residents where sampling has indicated contamination significantly above health investigation levels, the Government has offered to relocate residents, and buy-out leases on favourable terms. This has included components recognising loss of the family home and dislocation and disruption caused by the discovery of contaminants significantly above health investigation levels. Buy-out offers have also included an agreement to compensate for any demonstrable long-term economic loss suffered by the residents.
THE POLICY FOR CONTAMINATED SITES MANAGEMENT

The Government's policy approach is to investigate, manage, and where necessary, remediate existing contaminated land which may be a risk to human health or the environment, at the same time enforcing existing environment protection legislation governing the use of potential contaminants (eg under the Pesticides Act).

The Government's approach to managing particular sites is having processes in place that are sensitive and responsive to residents, while recognising the different interests and rights of the different parties involved. Of particular concern is the health and well-being of affected residents.
OBJECTIVES AND STRATEGIES

This section sets out the specific objectives of the Strategic Plan and addresses each with one or more strategic actions to ensure that each objective is attained. A timetable and responsibility for meeting these objectives is at Appendix 2. The objectives cover six broad areas of concern for managing the contamination of land (including groundwater) in the ACT. These six areas are:

1. Listings of sites
2. Legislative Options
3. Occupational Health and Safety
4. Consultation
5. Education and information
6. Site management, including:
   - Residential land
   - Leased public use areas
   - Other public use areas
   - Future development areas
   - Rural leases
   - Industrial sites and storage areas
   - Contaminated waste disposal
   - Other contaminating activities
1. LISTINGS OF SITES

Objectives

• To have in place listings of sites in the ACT known or suspected of being contaminated.

• To develop a reliable system to alert current and potential lessees of possible or confirmed contamination of sites.

• To provide appropriate access to the contaminated sites listings.

It has recently become clear that the locations of sites which may be, or are, contaminated with hazardous substances have been insufficiently recorded since the beginning of development in Canberra.

It is important that a consolidated listing of currently-known locations of potential contamination be prepared and systematically investigated where there are potential risks to the health of the ACT community and/or the environment, and to ensure such sites are managed appropriately according to their land use.

A central repository of data will present an overall picture of the extent of possible contamination in Territory and enable all Government departments and the general public to add to the information base and to access it on a controlled basis. It will provide a basis for prioritising sites for investigation and assessment and provide an input to future planning and development. The listings will be dynamic in nature as new potentially contaminated sites and sites of newly identified contaminants come to light.

Apart from providing Government with information on which to base its decisions in the management of contaminated sites and broader land management, a listing of sites would also give the community information and improved confidence.

The Government is attracted to the option of including information on confirmed contaminated residential sites on the building file. This approach will enable protection of individual privacy with protection of the rights of prospective purchasers. Other contaminated land might be identified by means of a overlay to the Territory Plan. While it would be useful to maintain a register of suspected contaminated sites, the inclusion of such sites in a public register could have serious consequences for leaseholders, including possible economic effects which could be based on erroneous information.
The information on building files should include known contaminants, their precise level and location on relevant health and environmental investigation levels. Such information would be routinely available to people with an interest in, say, purchasing a property, but would protect the privacy of individual residents who did not wish to sell or rent. However, the Government will need to consider whether historical information on remediated land should be available, given possible adverse impacts on vendors and associated potential claims for compensation.

Once a site has been remediated the file should include details of the results of post-remediation sampling.

At this stage the Government’s view is that as a minimum the health investigation level should be used but there may be cases where the environmental investigation level or some other level may be appropriate.

Strategies:

1.1.1 Consolidate information on contaminated land from existing information.

1.1.2 Update the information on the listing as new sites are notified, old sites are remediated and new contaminants are identified.

1.2.1 Determine the feasibility of introducing a system of including known contamination on building files, and making such files available to people with an interest in a particular property.
Objective

- To ensure existing environmental protection and land management legislation enables the Government to carry out its public health and environmental management responsibilities to the community, and which protect community members.

Consistent with its policy of avoiding additional costs to the community, the Government proposes to look at existing legislative mechanisms to address this issue in the ACT. Existing legislation will be modified where necessary to establish the roles and responsibilities of polluters, land managers and lessees in investigation and remediation of contaminated land.

The Government's discussion paper on legislative options will discuss:

- determination of liability for assessment of sites;
- determination of liability for the cost of remediation;
- the need for authorised persons to access sites for the purposes of testing;
- information/site listing requirements; and
- the ability to deal with orphan sites.

Strategies

2.1.1
Review the current legislation and identify those areas in which the legislation is deficient in relation to contaminated sites management.

2.1.2
Issue a discussion paper as part of a community consultation process to provide a wide cross-section of views.
3. OCCUPATIONAL HEALTH AND SAFETY

Objective

• To ensure that any public access to, and working arrangements, are designed so as to reduce the extent of hazard and the degree of risk where contaminated materials are being handled or where exposure to hazardous substances may occur.

Where the use of substances has resulted in the contamination of a site or the remediation of a site is initiated there is a risk that unsafe exposure to contaminated material may occur. The welfare of the general community and of people engaged in surveys, testing and remediation activities where there is a possibility of exposure to contaminated material must be safeguarded. General requirements are detailed in the relevant occupational health and safety legislation.

Strategies

3.1.1
A protocol is being developed for actions to be taken on each contaminated site. This protocol will have as its highest priority the requirement for safeguarding human health of residents, employees and other visitors to the site based on general assessments of risk. The protocol will ensure that sites management and remediation options approved by Government must address occupational health and safety issues in conformity with both public and private sector OH&S practices.

3.1.2
Remediation contracts will include OH&S provisions, and adherence by contractors and workers undertaking remedation activities will be considered part of any contract. Whenever there is an assessment made that any procedure or action required under the protocol should be altered in a particular circumstance for whatever reason, no decision will be made without full consultation between all affected persons. Union representation should occur as considered necessary by any party involved.
Objectives

- To involve the community in the implementation of the Strategic Plan and its reviews.
- To involve the Government workforce in the implementation of the Strategic Plan.

The Government recognises consultation with the community as an important component of the development and implementation of government policy and actions. In line with industrial democracy policy, unions and staff will be consulted where working conditions might be affected. Therefore, consultation on issues identified in this Strategic Plan will be an integral part of its implementation. Future reviews of the Strategic Plan involve continuing community consultation.

Strategies

4.1.1
When planning for the implementation of a strategy is undertaken, relevant stakeholders will be advised and will have the opportunity to comment on the planned implementation procedures.

4.1.2
The community will be involved in evaluations of the Strategic Plan through meetings and invited submissions.

4.2.1
Where applicable, the implementation of strategies will commence with workplace meetings to discuss any labour concerns with proposed activities. Where concerns are raised they will be resolved in line with agreed industrial processes.
5. EDUCATION AND INFORMATION

The public health and environmental impacts of contaminants and the impact of a particular contaminant on different sites may vary considerably. Education of the general community about their responsibilities for handling hazardous substances and remedial measures and communication about risk management will assist the understanding of the actions of government instrumentalities. Public concerns will be allayed if quality and timely advice is given to those people who may be affected directly and indirectly by identified substance contamination and clear information is available about contamination and the manner in which it is managed by government bodies. This Strategic Plan is one element of that information approach.

Strategies

5.1.1 Communicate directly with those people who are immediately affected by contamination or potential contamination of a site and provide comprehensive information about the contamination and the proposed management measures to be undertaken. Arrange to keep these people informed of progress in assessment and any remediation proposed.

5.1.2 Assist the community, the media and other stakeholders to understand the technical aspects and increase the level of participation in arranging management solutions to maintain trust and credibility between parties. Produce information pamphlets, position papers and media releases as appropriate to keep the community informed about current issues and management options for the management of contaminated sites. These documents will cover public health and environmental matters and may address any other issue in this Strategic Plan.
5.1.3
Ensure that people who are directly affected by contaminated land have access to the best available information on potential health impacts and access to health testing.
RESIDENTIAL LAND

Objectives

- To document fully the location and extent of residential blocks on primary contamination sites.
- To protect public health and the environment through appropriate assessment and remediation of contamination on residential sites.
- To keep the directly affected residents and lessees fully informed of the process and procedures being followed.

The Government has become aware recently of areas in Canberra where residences have been built on sites identified as historical locations of potentially contaminating practices. The extent of remediation and modification of the land during development activities prior to and during house construction on these sites is unknown.

Strategies

6.1.1
Undertake exploratory and comprehensive testing of residential blocks which may be contaminated from past activities.

6.2.1
Ensure that appropriate actions are taken during the comprehensive testing stage to protect the health and welfare of residents concerned; for example by temporary relocation of residents to alternative accommodation where necessary.

6.2.2
Assess the results of testing in accordance with risk management protocols for public health and the environment and then determine and implement management or remediation measures which will provide acceptable environmental and/or health risks from any residual contaminants remaining on site.
6.3.1 Affected residents and lessees are to be notified about known potential contamination of their blocks at the earliest opportunity and be given health advice and offered counselling.

6.3.2 Directly affected residents and lessees are to be kept informed of all results of testing as soon as is practicable and are to be consulted fully in the determination of remedial measures. They are to be provided with copies of relevant protocols and/or given an explanation of the procedures followed.

6.3.3 Lessees and residents of surrounding properties will also be informed of the reason for, and the extent of, testing and the overall results. They will also be consulted as part of any remediation process to allay any possible concerns.

LEASED PUBLIC USE AREAS

Objectives

• To identify and address those areas where potentially contaminating activities were located and which have been leased for development and commercial public use and to implement appropriate management or remediation as required

• To ensure that future uses of potentially contaminated sites do not compromise public health or pose an unacceptable threat to the environment.

These are areas developed for commercial public use and as such they need to be addressed as separate management units within this Strategic Plan.

Strategies

7.1.1 Identify sites of suspected contamination and ensure that, under the Polluter Pays Principle, a site investigation and appropriate sampling regime for public health and environmental risk assessment is completed.
7.1.2
Under the Polluter Pays Principle, undertake the assessment of the public health and environmental risks associated with the known level of contaminants on a site basis.

7.1.3
Under the Polluter Pays Principle, and as part of the licensing process, develop a remediation plan for a site assessed as posing an unacceptable public health and/or environmental risk or produce a management statement for a site which has acceptable contaminant levels for the location and land uses permitted by the lease purpose clause.

7.2.1
On those sites for which public health and environmental risk assessments determine that land uses are acceptable (i.e. acceptable risk sites), the Government will notify the lessee and restrict lease changes to activities compatible with acceptable risk contamination levels for the location.

7.2.2
Ensure that any change in the lease purpose clause is consistent with acceptable risk contamination levels for the location or require the lessee to undertake further remediation so that contamination levels are within government approved parameters for the intended land use.

7.2.3
Ensure that at the time of change of land use or of lease purpose, any site on which an activity (which is contained in a schedule of potentially contaminating activities) may have been carried out is investigated by the polluter wherever identifiable and possible. An environmental and public health assessment will be completed and reported to government.

OTHER PUBLIC USE AREAS

Objective

- To identify potentially contaminated sites and document their past management so that an appropriate sampling strategy can be undertaken and public health and environmental risk assessments made.

These are areas managed by the ACT Government. There is a need to document the sites fully and to take appropriate management action.
Strategies

8.1.1
Document sites of suspected contamination so that a site investigation and appropriate sampling regime may be undertaken for public health and environmental risk assessment.

8.1.2
Assess the results of testing in accordance with risk management protocols for public health and the environment and then determine remediation measures which will provide acceptable environmental and/or health risks from any residual contaminants remaining on site.

8.1.3
Develop a remediation plan for sites assessed as posing unacceptable public health and/or environmental risk or produce a management statement for acceptable risk sites. Those sites with unacceptable risk should be remediated as a matter of priority to provide acceptable environmental and/or health risks from any residual contaminants remaining on site.

FUTURE DEVELOPMENT AREAS

Objective

• To ensure that all information on potentially contaminated sites is made available at the early planning stage.

The Government aims to obviate the problems generated from activities which occurred prior to development. It will assess potentially contaminated sites, as current knowledge permits, so that necessary remediation and management can be undertaken. These actions will permit the integration of constraints imposed by potentially contaminated sites into development planning at the earliest opportunity.
Strategy

9.1.1
The Government will oversee a program of investigation, and if necessary full assessment, of identified potentially contaminated sites to meet site and land development program requirements. This will include, through consultation, any development plans of the National Capital Planning Authority. Site testing normally will be expected to commence several years before any development activities on the ground.

RURAL LEASES

Objective

• To identify potentially contaminated sites on rural leases and develop a management and/or remediation plan for each site identified.

Many rural leases in the ACT have a long history of use for sheep grazing. Sheep husbandry technology has changed markedly to the present day and knowledge about the effects of substances used for that husbandry has similarly advanced to the stage where we are now aware of the harmful effects some of the substances used historically may have on human health and the environment. For example, old sheep-dips on ACT soils are likely to have measurable environmental effect adjacent to the sheep-dips. Old waste disposal sites also are of concern. On rural leases present day human contact with these sites can be readily avoided. While they are a lower priority for action than contaminated sites with more immediate health impact concerns, they remain a source of potential contamination and their management needs to be addressed in the longer term.

Strategies

10.1.1
Access information on government files and aerial photographs, interview rural residents and agricultural rangers and, as priorities permit, undertake field inspections to ascertain the location of potentially contaminated sites.
10.1.2
In conjunction with government agencies, rural lessees to develop assessment, management and, as necessary, remediation plans for potentially contaminated sites to minimise adverse effects on human health and the environment.

INDUSTRIAL SITES AND STORAGE AREAS

Objectives

- To identify sites which may be or may have been contaminated by industrial activity or which were used for storage of potential contaminants and develop a management and/or remediation plan for each site identified.

- To maintain a current knowledge of the use of hazardous substances in ACT industries and update the database of potential contaminants on a regular basis.

- To monitor the movement of hazardous wastes within the ACT and across the border.

- To take appropriate precautionary measures when industrial premises are partly dismantled, decommissioned, redeveloped, improved or transferred.

Industrial activity is a major potential source of contamination through spillage and leakage, deliberate and illegal dumping and waste product discharge. This type of site contamination is difficult to identify and identification may occur, and only be possible, after the use of the site has changed or the site has been abandoned.

Strategies

11.1.1
Analyse industrial activities in the ACT and identify potential contaminants used by each industry group. Follow-up that analysis with industry surveys to clarify hazardous substance usage, storage and disposal regimes.

11.1.2
Wherever a potential contamination risk is suspected, provide in legislation the capacity to require the polluter, under the Polluter Pays Principle, to undertake investigations to ascertain the extent of any contamination.
11.1.3 Under the Polluter Pays Principle, government approved public health and environmental risk assessments will be prepared and submitted. Where there is an awareness of the possibility of an immediate health risk to employees or other people on the site, provide in legislation the capacity to require notification to the ACT Government agencies responsible for public health and occupational health and safety as rapidly as possible.

11.1.4 Include in legislation the power to issue a notice, under the Polluter Pays Principle, requiring the polluter to develop a remediation program for the site and initiate remediation action.

11.2.1 A systematic review of the use of new industrial substances will be established so that information may be added to the database of potential contaminants.

11.3.1 Develop and implement a waste manifest and tracking system.

11.4.1 Require in legislation that lessees exercise care during any dismantling of industrial sites, that residual and hazardous materials are contained and that clean-up procedures are carried out as dismantling, decommissioning, redevelopment, improvement or transfer takes place.

11.4.2 Require in legislation that upon dismantling, decommissioning, redevelopment, improvement or transfer of industrial premises a site report by a certified assessor be prepared by the owner or occupier.
CONTAMINATED WASTE DISPOSAL

Objective

- Where on-site remediation is not feasible, to provide secure Government facilities of sufficient size for the long term storage of contaminated material.
- To assess further all known sites used for disposal of hazardous waste and determine appropriate management actions.

The Government has established sites and storage facilities for contaminated waste disposal. Existing facilities are carefully managed on a long term basis and are secure. Nevertheless, some members of the community will always have concerns about the potential for the stored wastes to escape from the site and it is the Government's intention that such concerns are allayed as well as possible. Any future expansion of sites or the upgrading of sites for disposal of new substances must be addressed at the community level.

Potential contamination at existing and former waste disposal sites also must be addressed in light of current knowledge about hazardous substances. The locations of these sites have been identified previously.

Strategies

12.1.1
Review current long term storage facilities, determine their suitability and applicability to the storage of contaminated soils and estimate their capacity to meet future requirements.

12.1.2
From that review, outline an approach to ensure that estimated long term storage requirements will be met in a manner consistent with sound public health and environmental management and occupational health and safety.

12.1.3
Ensure that there is community involvement through consultation in decision making about any new, expanded or upgraded disposal or storage site for contaminated soil.

12.2.1
Document site usage and all hazardous substances suspected of being deposited at the sites and undertake testing on a priority basis.
12.2.2
Assess the results of testing in accordance with risk management protocols for public health and the environment and then determine remediation measures which will provide acceptable environmental and/or health risks from any residual contaminants remaining on site.

OTHER CONTAMINATING ACTIVITIES

Objective

• To ensure that current developments in knowledge about the short and long term effects of substances in use in the ACT are monitored and that relevant and timely action is taken to minimise adverse effects on the community and the environment.

Improvements in knowledge about the effects of substances on human health and the environment are being made regularly. Some substances which were once considered safe for general and widespread use are now no longer used because of their adverse effects. Others must be used under restrictive practices to prevent detrimental health and environment effects. It is essential to keep abreast of current developments.

Strategies

13.1.1
Appropriate government departments will monitor scientific developments about public health and environmental effects of hazardous substances and chemical toxicology relevant to their portfolios. When significant effects become known these departments will initiate appropriate consultation and other actions consistent with this Strategic Plan to address emerging issues.

13.1.2
Participate in the "existing chemicals review" programs of the Commonwealth Environmental Protection Agency, National Registration Authority and the Chemical Safety Unit of the Commonwealth Department of Human Services and Health.
APPENDIX 1: RESPONDENTS TO THE DRAFT STRATEGIC PLAN FOR
CONTAMINATED SITES MANAGEMENT

1. Dr Helen Sims
   Manager
   Office of the Commissioner for the Environment ACT

2. Dr Andrew Langley
   Manager
   Hazardous Substances Section
   Public and Environmental Health Service
   South Australian Health Commission

3. Dr Tony Cheng
   Principal Scientist
   Environmental Health Assessment and Criteria
   Commonwealth Department of Human Services and Health

4. Mr Barry Raison
   Valuer

5. Ms Cathy Dyer
   Manager
   Contaminated Sites
   NSW Environment Protection Authority

6. Mr Eric Martin
   Chair
   ACT Heritage Council

7. Mr Craig Darlington
   Director
   Conservation Council of the South-east Region and Canberra, Inc.

8. Mr John Snell
   Vice President
   National Environmental Law Association

9. Ms Mariann Grinter
   National Toxic Network
APPENDIX 2: AGENCIES RESPONSIBLE FOR THE IMPLEMENTATION OF STRATEGIES AND THE PROGRAM FOR IMPLEMENTATION (I), COMPLETION (C) OR OTHER ACTION

Abbreviations:

All Depts. All ACT Government Departments
CMD Chief Minister’s Department
DOH & CC Department of Health and Community Care
DPA Department of Public Administration
DUS Department of Urban Services

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<thead>
<tr>
<th>Strategy</th>
<th>Lead Agency</th>
<th>Others</th>
<th>(I), (C) or other</th>
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