


# Summary of responses to the first stage of consultation on the review of the *Contaminated Sites Act 2003*

February 2013



Department of  
**Environment and Conservation**

*Our environment, our future* 

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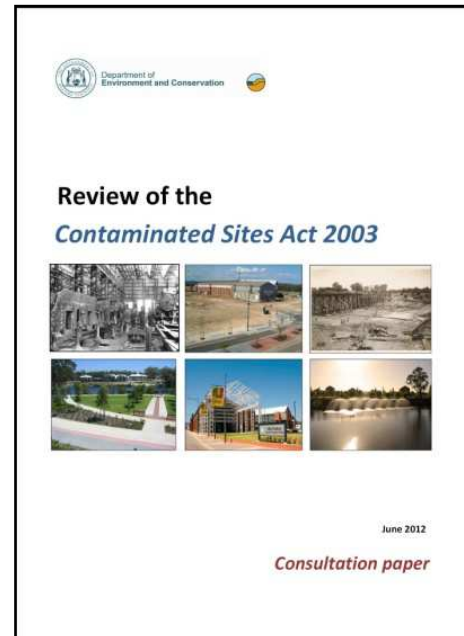
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## Review of the *Contaminated Sites Act 2003*

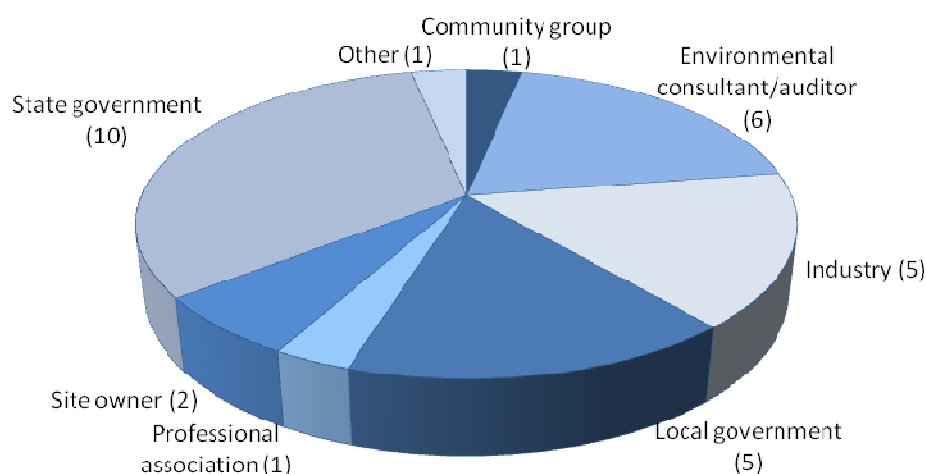
### Introduction

Western Australia's *Contaminated Sites Act 2003* (the Act) and Contaminated Sites Regulations 2006 took effect in December 2006, and the statutory five-year review of their operation and effectiveness is underway. The first phase of public consultation is complete and this document summarises stakeholder responses and feedback.

In June 2012 stakeholders were invited to read and comment on a consultation paper outlining the review of the Act. The first stage of the consultation process ended on 28 September 2012. Thank you to all who took the time to provide comments and feedback on the Act and its associated procedures. The Department of Environment and Conservation (DEC) received 31 submissions from a wide range of stakeholders including environmental consultants, local government, state government agencies, industry, professional associations and one community group. (See Annex 1 for a list of all respondents who contributed to the consultation.)



### Who responded to the public consultation?



Not all stakeholders responded to every question, however, at least 17 responses were received for each question, representing a broad range of stakeholders.

We also received 32 submissions to an online survey, which focused on how DEC provides information on contaminated sites. The survey sought feedback on how we can improve our procedures and enhance the public accessibility of information.

The consultation paper was designed to introduce some of the issues that had been raised by stakeholders, and to stimulate discussion and comment about areas of the legislation that may require review or amendment. However, comments and feedback were invited on **any** issues related to the legislation, and this consultation process was not restricted by the content of the consultation paper.

The consultation paper sought comments in relation to 10 broad issues:

1. Duty to report
2. Site classification scheme
3. Notification of site classification
4. Hierarchy of responsibility
5. Availability and value of information provided under the Act
6. Mandatory disclosure requirements
7. Timeframes for investigation and remediation
8. Source sites and affected sites
9. Contaminated sites auditors
10. Contaminated Sites Committee

## Summary objective

The aims of this document are to present an overview of the comments received, and provide examples of the comments received from individuals and organisations.

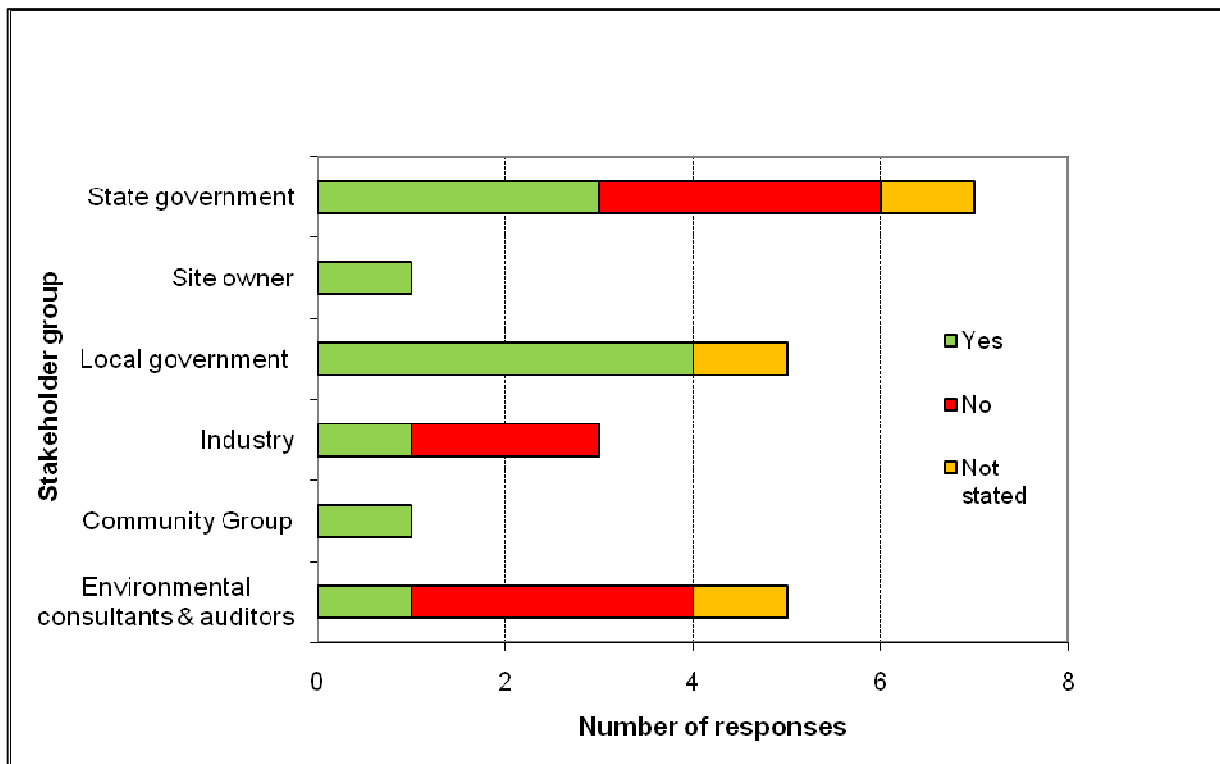
This document does not comment on any individual opinions expressed in the responses, nor does it provide any response from DEC. This will be addressed in a forthcoming discussion paper which will invite further stakeholder comment.

# Summary of submissions

## 1. Duty to report

The Act introduced mandatory reporting of known or suspected contamination so that contaminated sites are identified and recorded on the Contaminated Sites Register, and the identified risks are managed appropriately. If any other person (such as a contaminated land consultant) becomes aware of known or suspected contamination they may report it, but are not obliged to do so. We asked:

**Should a person with the professional knowledge to identify contamination have a duty to report it?**



The 22 responses to this question were split, with 50 per cent agreeing that a person with professional knowledge to identify contamination should be duty-bound to report it. However, it was apparent that not all respondents are clear on the meaning of ‘person with professional knowledge’ and that this would need to be clearly defined if the legislation was changed to

reflect this new reporting requirement. A selection of the comments received is published below:

### Agreed:

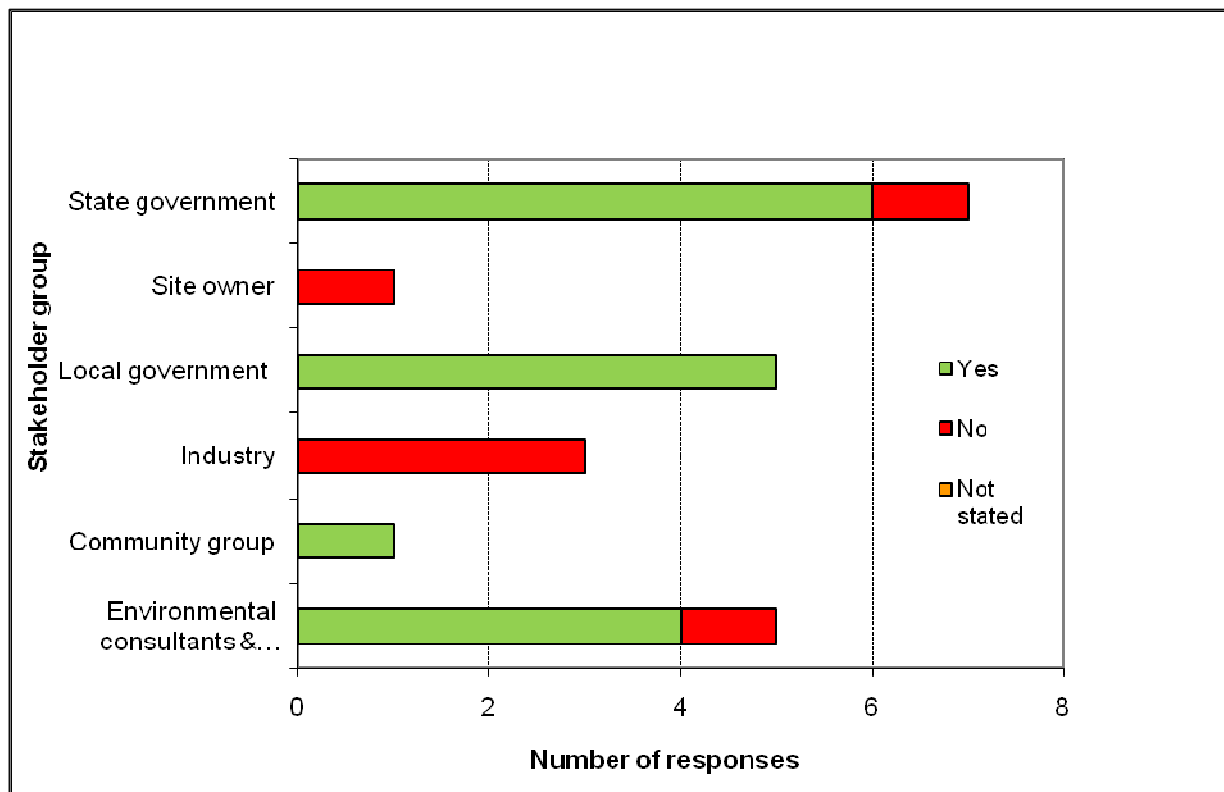
- “Yes, particularly if the overall objective of the Act is to improve knowledge on the location of contaminated sites in order to protect human health and the environment.” *Local government*
- “If such a duty is enacted, there will also be a need to define ‘a person with professional knowledge’ and what the penalties/consequences of inaction are. At a minimum, the definition of a person with professional knowledge should include any person (or organisation) responsible for the reporting of any contaminant monitoring at a site.” *State government*
- “This would ensure that consultants employed to assess site contamination have a responsibility to report their findings. The contamination may become a risk to the environment and human health if left unreported.” *Local government*
- “Yes, if they have been commissioned to undertake work on the site.” *Environmental consultant/contaminated sites auditor*

### Disagreed:

- “Professional knowledge would need to be clearly defined in terms of specific skills/capabilities; otherwise persons may report a site which does not require reporting.” *State government*
- “When a client engages a consultant, a professional and confidential relationship is entered into. By reporting a site, this would be seen as a breach of confidentiality and contract. It may also result in a number of sites not progressing to assessment due to concerns that the consultant may report the site to DEC. An alternative may be for a duty to report sites where there is a significant risk of harm. However, in this case, clear instruction regarding what is deemed to be a significant risk will be required.” *Environmental consultant/contaminated sites auditor*
- “The department is generally supportive of the idea as a means of better identifying potentially contaminated sites which may otherwise remain undetected. However, there are a number of possible problems that may make it impractical, counterproductive or hard to manage. Owners and polluters may be more reluctant to seek professional advice if they may be ‘dobbbed in’. There will need to be clarity around what ‘professional knowledge’ equates to. Unless the ‘professional knowledge’ definition is very focused it may accidentally or intentionally include some professional groups that do not have the resources to make such notifications or who may wish to avoid any possible disruption in the conduct of their routine work e.g. Local Government EHOs or occupational professionals.” *State government*

The guideline *Reporting of Known or Suspected Contaminated Sites* (DEC, December 2006) provides direction for people reporting contaminated sites in accordance with the the Act. It provides examples of site scenarios where we recommend that the site is reported under the provisions of the Act. We asked:

### Are the requirements for reporting known or suspected contamination clear?



There were 22 comments on this question, with most respondents (16) confirming that the requirements for reporting known and suspected contaminated sites were clear. However, feedback from industry respondents and some state agencies indicated that ‘suspected’ contamination was often more difficult to define and suggested more guidance be provided in this area. Some of the comments received are shown below:

- “The definition of contamination requires a substance, a pathway, a receptor and a risk to be present; this is very clear for known contamination however ‘suspected’ contamination is harder to define.” *State government*

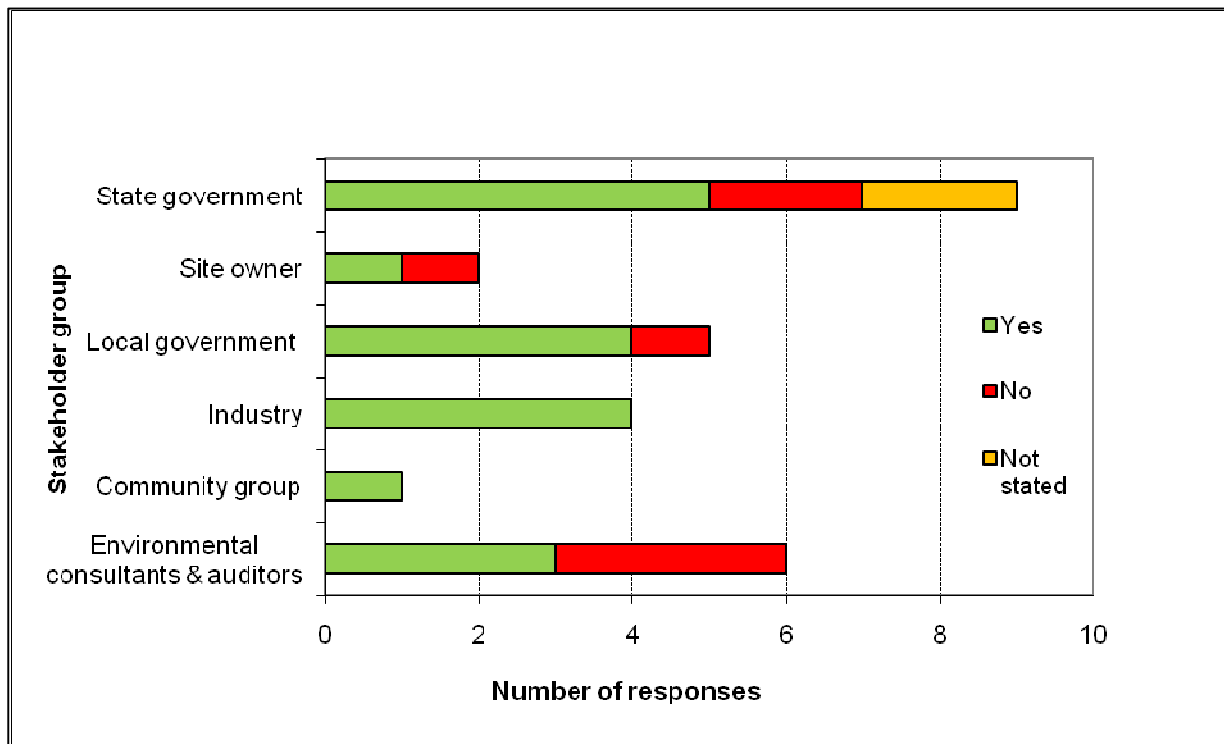
- “Yes. I would suggest the requirements for reporting are quite clear particularly when viewing the prescribed form, guidelines and fact sheets available on the DEC website. The question therefore is more whether people know they have to report the issue in the first place and know to go to the DEC website for more information.” *Local government*
- “A ‘known’ contaminated site is clear. ‘Suspected’ contaminated sites are less clear in terms of when a person suspects. The Potentially Contaminating Activities and Industries guideline provides a useful list of contaminating activities to guide reporting. In addition, a change of land use (to more sensitive) or knowledge of an unauthorised discharge/spill would provide further guidance regarding a site being ‘suspected’.” *State government*



## 2. Site classification scheme

The site classification scheme is aimed at providing a practical categorisation of sites that indicates the nature of the action required to investigate or manage the contamination. We asked:

**In circumstances where contamination has been identified but requires further investigation to determine whether clean up is required for the current or proposed land use, would a new classification such as ‘contaminated – investigation required’ be helpful?**



There were 25 responses to this question and most respondents agreed that a new classification may be appropriate. This new classification would indicate that some investigation had been carried out and contamination identified but that further investigation was required to determine the risk to human health and the environment and whether remediation (or management) was required. Examples of comments received are shown below:

### Agreed:

- “In circumstances where a preliminary investigation has identified contamination but further investigation is required, a new classification such as ‘contaminated-investigation required’ would be welcomed. Investigation actions would then be further driven to determine whether clean-up is necessary for the site-specific circumstances.” *Local government*
- “This should only be considered an interim classification and a set timeframe for actions associated with the classification should be applied. Such a classification would also be useful as it shifts the impetus for action to the owner/developer to remove the banner of ‘contaminated’.” *State government*
- “Yes, this additional classification would be useful especially if a preliminary investigation revealed contamination. If contamination is confirmed, it is not appropriate or accurate to classify the site as ‘potentially contaminated – investigation required’.” *Local government*
- “Contaminated – further investigation required may be more appropriate. To be classified as contaminated some level of investigation must have occurred, therefore adding “further” is appropriate. This new classification could help DEC classify a site more promptly, as current delays are significant.” *Industry*
- “Currently the classification possibly contaminated is too vague and in my personal experience allows the previous owner to avoid responsibility as the ‘possibly’ allows debate. The suggested new classification provides a clear instruction.” *Site owner*
- “The classification category ‘contaminated - investigation required’ would ideally be publically available on the CS Database. There should also be greater urgency (red – urgent immediate action) attached to the timeliness of the investigation where contamination is identified rather than suspected.” *State government*

#### **Disagreed:**

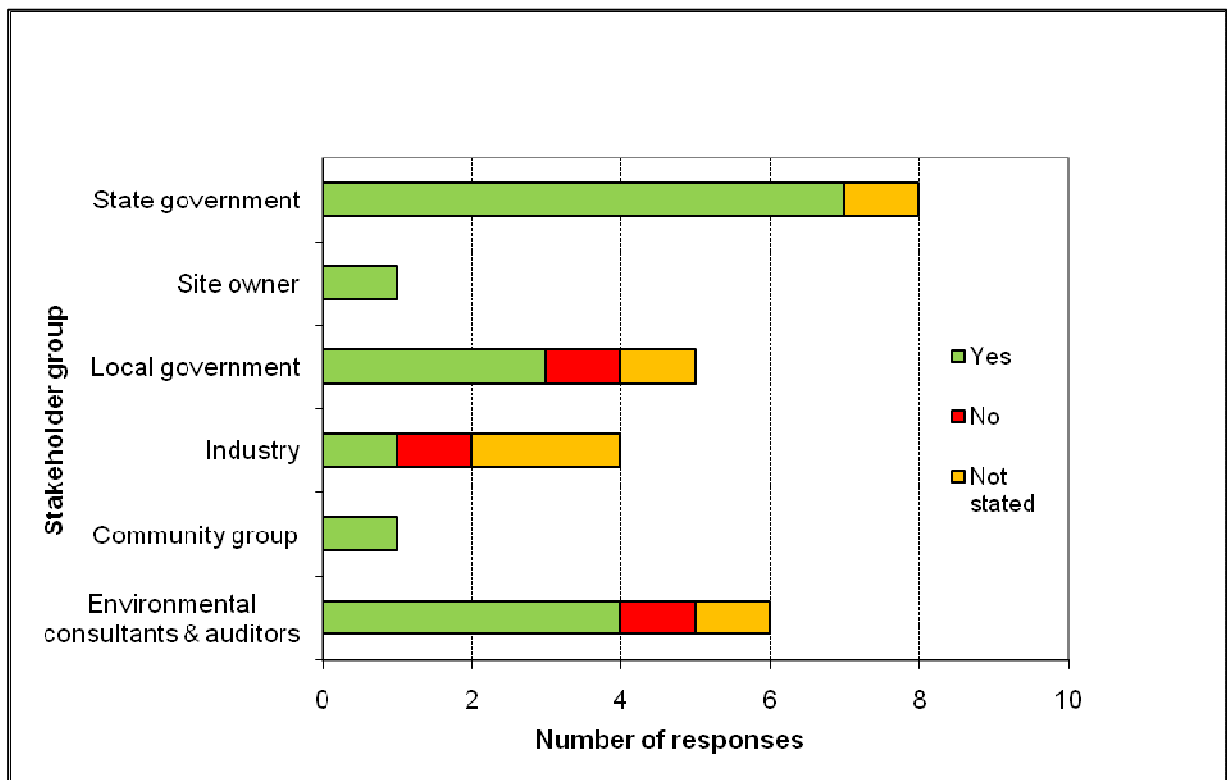
- “[The department] considers that it would be easier and serve the same purpose if the definition of C-RR [contaminated – remediation required] was broadened to indicate that further investigation may be part of the remediation process.” *State government*
- “We cannot see how this classification would operate effectively or add value to the system.” *Environmental consultant*
- “Intuitively ‘contamination’ suggests that an investigation has already taken place and the investigation has assessed that the level of contamination and its potential to impact the environment or human health is unacceptable. The differentiation between the two classifications and ‘contaminated - remediation required’ is therefore, too ambiguous.” *Environmental consultant/contaminated sites auditor*

- “Another alternative would be to reduce the number of classification levels and refer to this as ‘investigation required’.” *Environmental consultant/contaminated sites auditor*
- “There is little benefit in the proposed new classification as all contaminated sites will require further investigation at some point in the future. It is also noted that s.49 enables an Investigation Notice to be served and this could be used in instances where more information was required before making a determination on a site’s suitable uses.” *Local government*
- “It is not clear what the purpose of this additional classification is. If this classification does not incur obligations to undertake investigation works within a certain timeframe, or attract penalties if investigations are not completed, then it is unclear as what benefit this classification will have over the existing classifications.” *State government*
- “If anything, there is a general consensus that there are already too many classifications. Those outside of the industry do not understand the implications. Classifications should determine action required similar to traffic light signals.” *State government*

### 3. Notification of site classification

Once a site has been classified DEC must notify a number of people in writing, including the owner or occupier of the site and relevant public authorities (such as the local government authority and the Western Australian Planning Commission). The Act specifies that certain information is to be included in the notification; hence, notification is a formal document. We asked:

**If you have received or read a notification of site classification, did you understand what actions were required?**



Twenty-five respondents commented on this question and while more than half agreed that the notification letter was clear, there were a number of suggestions for improvements. Some of the comments received are reproduced below:

- “It would be beneficial to include DEC expectations on a broader range of matters. Some companies are not well versed in the Contaminated Sites Management Series and

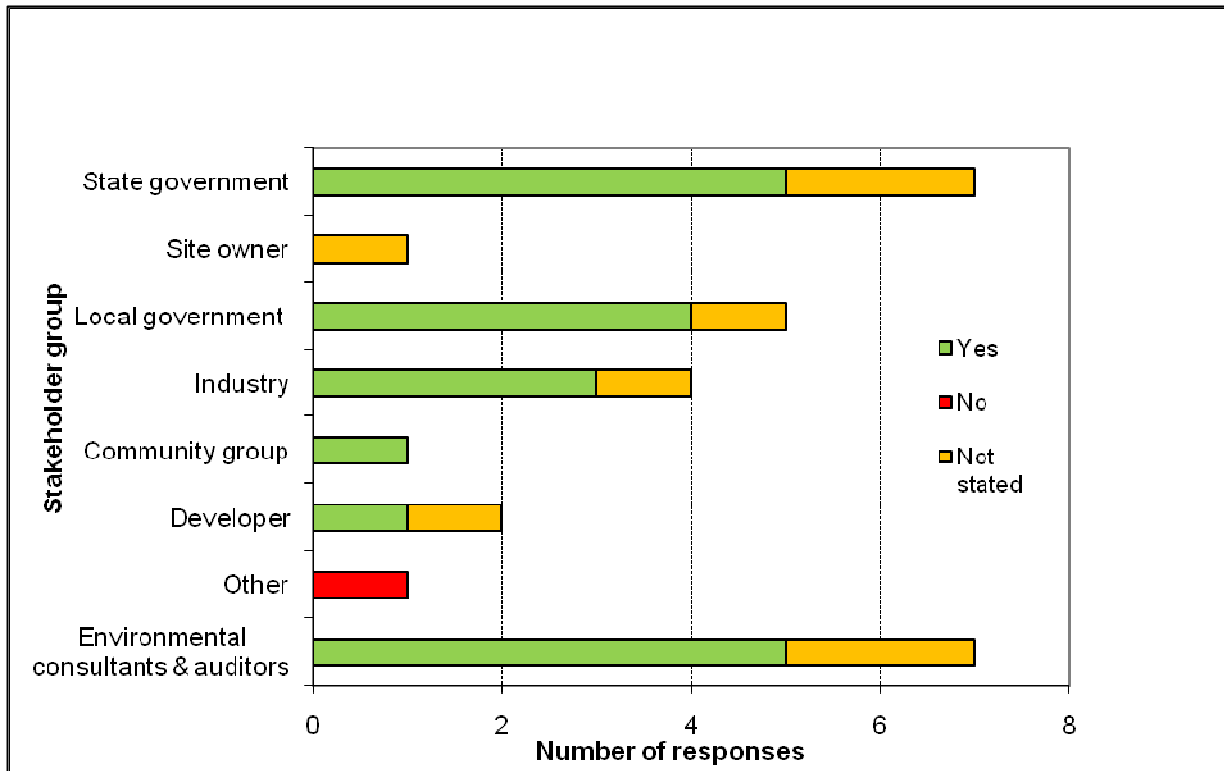
would benefit from additional regulatory guidance. The provision of a suitable site plan showing source and associated affected sites [would be helpful].” *Industry*

- “A site map showing the property in question may be useful not only in correctly identifying the subject property but also neighbouring properties that might be also affected and could be used to provide more detailed information. Copies of any photos taken indicating the problem may also be useful particularly later on when further investigation is being undertaken.” *Local government*
- “To some extent – the actions are generally clear however the timeframe for when they should be completed is not. If the DEC wants investigations to be completed; it needs to specify what actions need to be completed, by when, and what penalties will apply for non-compliance.” *State government*
- “The classification notice gives no indication to the party receiving the notification what their role in/contribution to the contamination is. This often makes it difficult to readily determine obligations under the Act, particularly for affected site owners/occupiers.” *Industry*
- “Traffic light approach is a great idea. National Strategy on Energy Efficiency is also considering the same approach.” *State government*

## 4. Hierarchy of responsibility

The Act introduced a hierarchy for responsibility for remediation, which lists the order of persons who can be held responsible for cleaning up a site. We asked:

### Has the hierarchy for responsibility been helpful?



We received 28 responses to this question with a clear majority agreeing that the hierarchy for responsibility was clear and had been useful. Some of the responses received are shown below:

#### Agreed:

- “Generally yes, however without clarification in the notice or from DEC, land owners generally take a ‘do nothing’ approach until prompted.” *Industry*
- “Yes, in so far as determining responsibility for remediation of contaminated sites or where changes to land use are proposed, the hierarchy for responsibility is relatively clear and easily applied. However, application of the hierarchy for responsibility in situations where investigation of contamination is required in order to inform a

decision on classification, or as a result of a classification, has been problematic.”

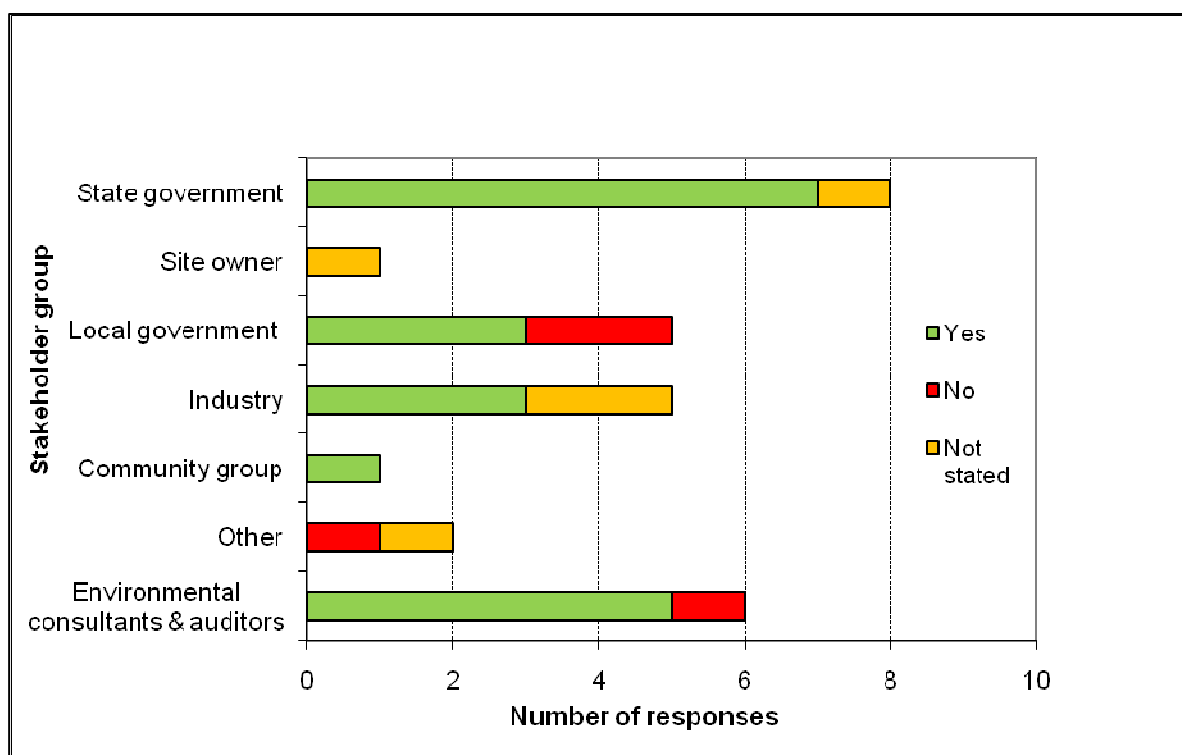
*Industry*

- “Yes, it is important that the polluter remains ultimately responsible for contamination on a site, regardless of whether they are the owner or not.” *Local government*
- “The hierarchy of responsibility clearly sets out who is responsible for remediation. However, the Act should provide greater opportunity to assist/protect affected landowners in seeking resolution of investigation/remediation of sites limiting their use, rather than pursuing matters through the civil court system. The Act does not limit DEC issuing investigation/cleanup notices to relevant parties that are affecting adjoining landowner’s ability to ‘enjoy’ the use of their site.” *State government*

## 5. Availability and value of information

One of the objectives of the Act is to make information on contaminated sites available to interested parties, such as prospective purchasers of land and lending institutions, persons undertaking intrusive maintenance or utility works, and relevant government agencies (such as environmental and health regulators and planning authorities). We asked:

**Is the process for obtaining information on contaminated sites clear and easy to use?**



This question attracted 28 responses and most respondents were satisfied with the availability of information on contaminated sites in WA. Some of the comments received are included below:

**Agreed:**



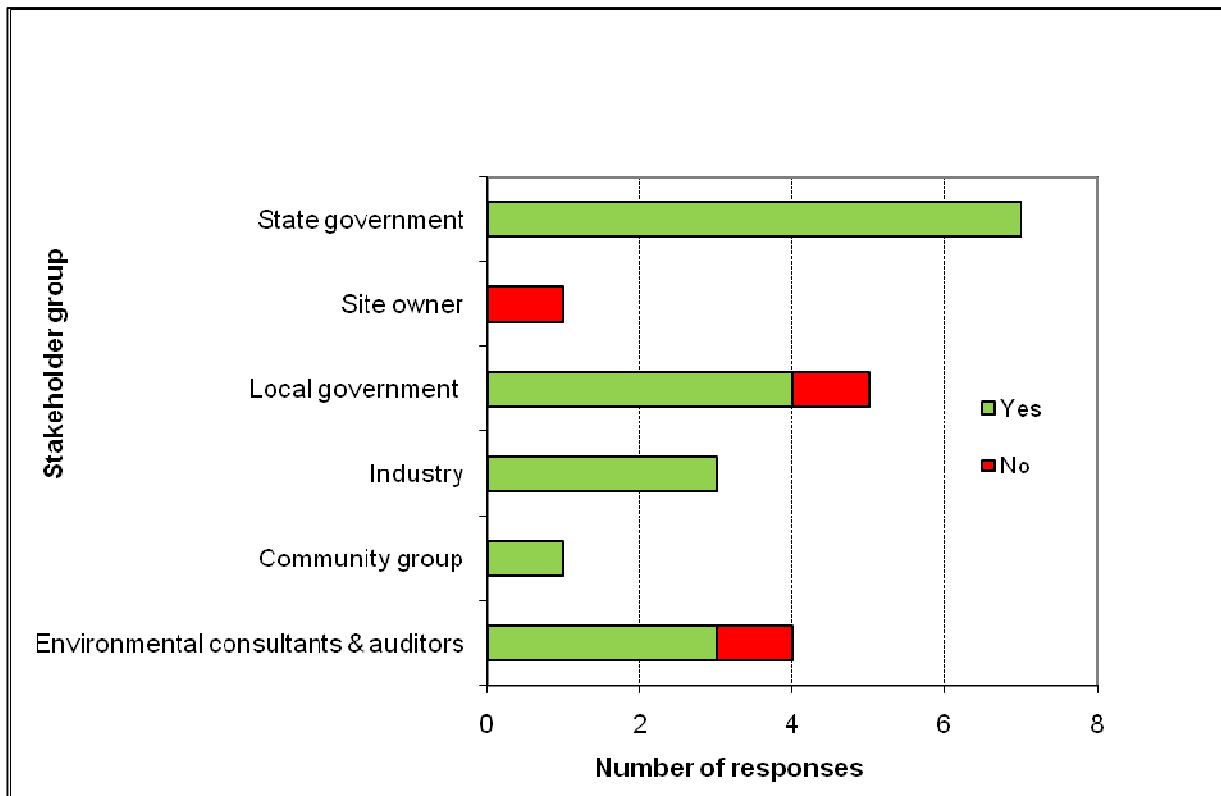
- “Generally yes, however, known contaminated sites that are classified as ‘possibly contaminated-investigation required’ are not on the database, hence the need to add a new classification.” *Industry*
- “Yes, however delays in classification make the available information unreliable and once the property is in the system/on the register, further delays in reclassifying means that it may not reflect the current status of the site.” *Industry*
- “The process for obtaining information is easy yet improvement may be suggested in the land transaction process to include an indicator at all levels if land has been, is suspected of, or is contaminated. Making all levels of reporting clear up front informs the public of any potential risk.” *State government*
- “The DEC website does provide a clear process to follow for obtaining the information on sites.” *State government*

### **Disagreed:**

- “The respondent understands the need to maintain confidentiality with contaminated sites information, however, we believe that public authorities should have greater access to contaminated sites information in order to effectively manage risks. This is important to manage occupational health and safety risks posed by substances adjacent to operational and proposed infrastructure and the costs involved in constructing infrastructure on contaminated sites.” *State government*
- “Full contaminated sites data should be publically available and free of charge. If full and free public access is not possible, full access should still be given to decision making authorities (e.g. local government).” *Local government*

### ***Availability and value of information (continued)***

**If a new classification of ‘contaminated – investigation required’ is introduced, should information on these sites be made publically available on the Contaminated Sites Database?**



The feedback to this question indicated that should a new classification be introduced, information on that classification should be made publically available. Of the 21 responses, 18 wanted sites classified ‘contaminated-investigation required’ recorded on the Contaminated Sites Database, which is available on DEC’s website. Some of the comments received are shown below:

**Agreed:**

- “Yes, since the contamination has been deemed to be the case and just the process towards its remediation has been made clearer.” *State government*
- “Yes, as this is consistent with the other ‘contaminated’ classifications. The information provided on the database and BSR should outline the known contaminants on site and

what investigations are required, by whom, by when. Mandatory Disclosure requirements should also apply.” *State government*

- “Yes, the site has been demonstrated to be contaminated. Further investigations are required to confirm extent of contamination.” *State government*
- “Yes – in order to raise awareness of and manage the risks.” *State government*
- “Yes. Landgate recommends that a Memorial be lodged in a similar way to that for other classifications, e.g. contaminated-remediation required.” *State government*

### **Disagreed:**

- “We agree with DEC that sites classified ‘possibly contaminated – investigation required’ should remain off the public database to avoid ‘blighting’. For the same reason we tend towards saying the new classification should be kept off the public database, however, it is difficult to say without clarification on the definition and/or scope of the new classification.” *Local government*
- By putting CIR [contaminated – investigation required] on a publically available database the information could be used incorrectly by uneducated members of the public, leading to unnecessary concern and panic regarding the site and level of contamination.” *Environmental consultant/contaminated sites auditor*

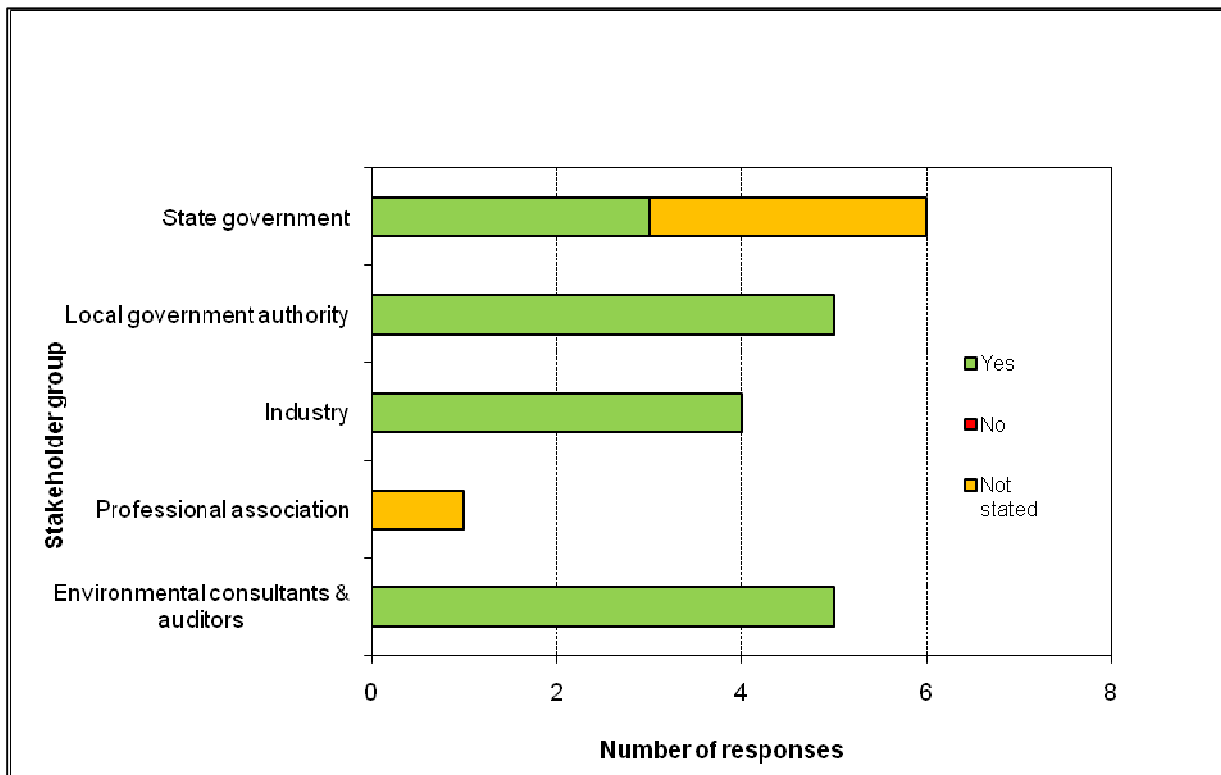
## 6. Mandatory disclosure

Landowners must provide written disclosure to any new or potential owners if selling or transferring land that has been classified as:

- *contaminated – restricted use*
- *contaminated – remediation required*
- *remediated for restricted use, or*
- where the land is subject to a regulatory notice under Part 4 of the Act and a memorial is registered on the Certificate of Title.

We asked:

### Are the mandatory disclosure requirements clear?



Most respondents said mandatory disclosure requirements were clear, however, some felt that the terms ‘owner’ and ‘completion of transaction’ needed some clarification. Of the 21 responses to this question, 17 understood the mandatory disclosure requirements. Example comments received are shown below:

- “Disclosure for sale and lease purposes are clear, however there are a number of other circumstances when third parties access land where it is unclear if disclosure should be completed.” *State government*
- “Yes, they are clear. However, they are not adequate. The land classifications which current owners must declare to prospective buyers should be extended to include ‘possibly contaminated – investigation required’.” *Local government*
- “The meaning of ‘owner’ should be clarified to mean only the registered proprietor the land.” *Professional association*
- “Yes, although more public education would probably be beneficial.” *Environmental consultant/contaminated sites auditor*

## 7. Timeframes for investigation and remediation

The Act does not specify timeframes for the investigation and remediation of sites once they have been classified. In our consultation paper we said we did not consider that timeframes needed to be included in any amendments to the Act. However, we asked:

### Do you have any suggestions that may assist responsible persons in undertaking more timely investigations and clean ups?

The responses to this question were not able to be graphed, however, there were 27 responses and the vast majority of respondents asked us to provide timeframes and expectations for investigations and remediation. Comments also stressed the need for enforcement and penalties for noncompliance. Some of the responses received are provided below:

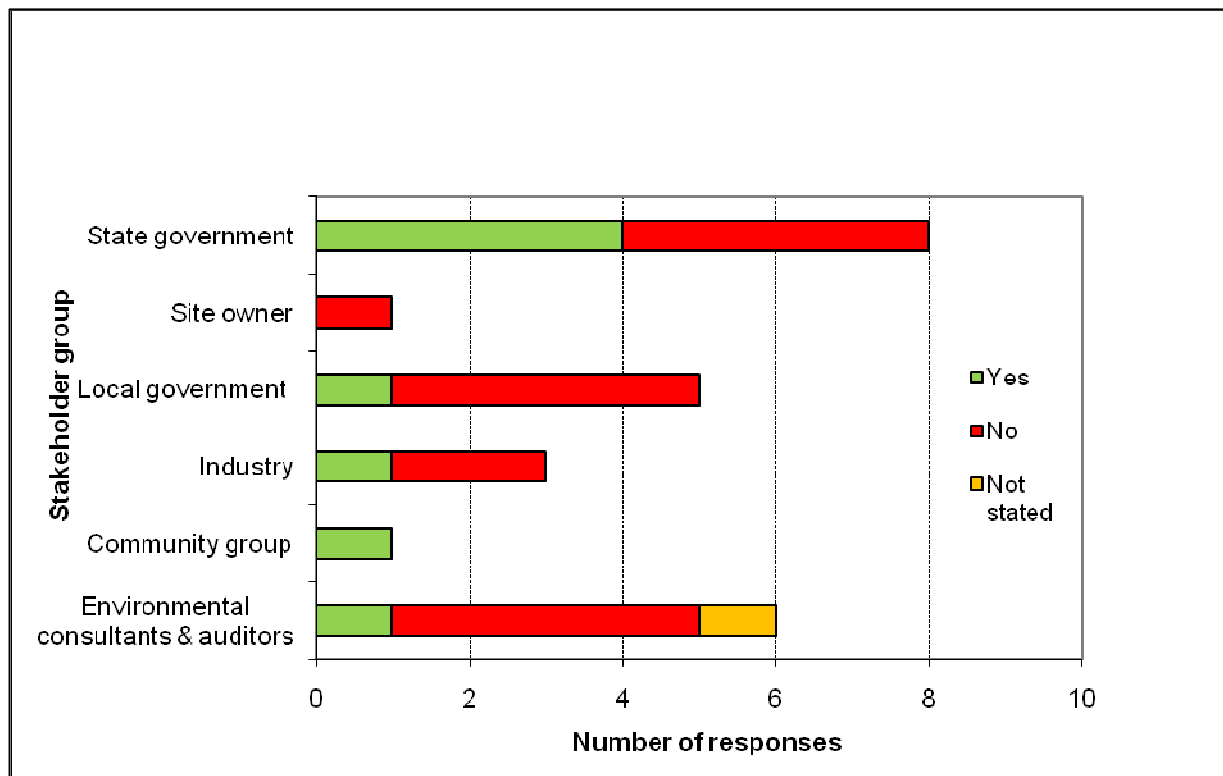
#### Comments:

- “Provision of timeframes and the reasons why investigation/remediation is required in Notification of Classification letters, on the Contaminated Sites Database, and in the Basic Summary of Record may assist those responsible to understand their requirements, and affected site owners/occupiers to understand the timeframes of when works will be completed. Classified sites that knowingly pose an ongoing risk to human health/ environment should require an appropriate response and action in accordance with the hierarchy.” *State government*
- “Inserting penalties for non-compliance with these timeframes into the Act would greatly assist in ensuring investigations/remediation are completed. DEC would need to enforce timeframes using the provisions contained within the Act or have additional provisions included in a revision to the Act.” *Industry*
- “Provision of timeframes with the notice of classification would provide further indication as to the need for investigation/remediation and possibly reduce the delays in assessments/remediation works by some site owners.” *Environmental consultant*
- “It would help if the DEC clarified expectations about the urgency of response. This could be included either in the notice of classification or via separate correspondence (the proposed stop light approach is a start, provided each light is defined).” *Industry*

## 8. Source sites and affected sites

Where contamination has moved from one parcel of land (source site) to affect other land (affected sites), it is important that the owners of affected land are made aware of the contamination as soon as possible. Currently the owner of a source site is required to report the affected land parcels to DEC if they become aware that contamination has migrated off-site. They also have a responsibility to undertake community consultation with affected parties. In practice, owners of affected sites are often unaware that their land is affected by contamination until they are notified by us. We asked:

**Should source site owners have a duty to notify affected landowners (as well as DEC), as soon as they become aware that contamination has migrated off-site?**



There were 24 responses to this question and the majority stated that to ensure accuracy and consistency of information DEC should remain responsible for notifying affected landowners. Some of the comments received are shown below:

### Agreed:

- “This would encourage direct contact between the polluter and affected land owner. However, it may also result in source site owners not voluntarily undertaking investigations which will incriminate themselves.” *State government*
- “Source owners should notify affected site owners. Stakeholder consultation is part of the process of managing contaminated sites and as the polluter is responsible for managing contamination, the polluter should notify affected parties of that contamination.” *State government*
- “It is recommended that DEC revisit its Community Consultation guidelines and emphasise that community consultation be considered in all projects, at the earliest stages of a PSI [preliminary site investigation] including a documented assessment of the project and community to determine the level and extent of community consultation required.” *Environmental consultant*

### Disagreed:

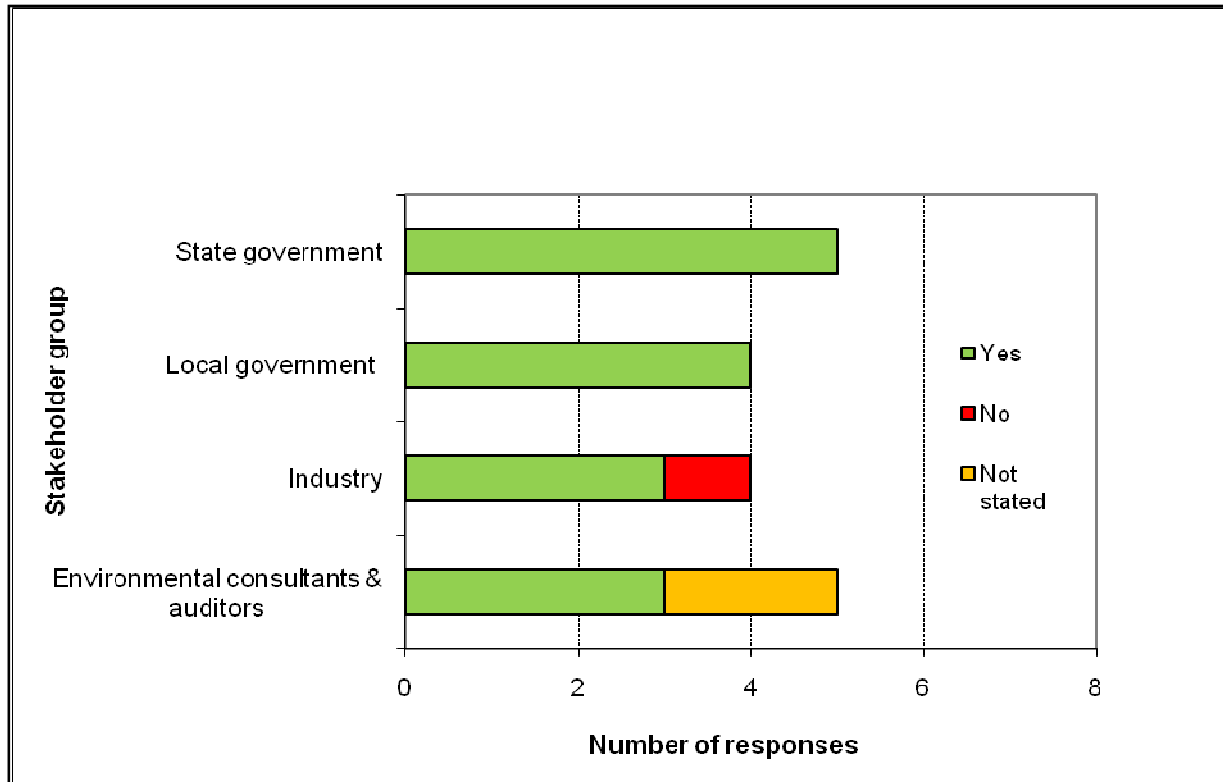
- “Land owners may have insufficient knowledge to notify affected site owners and/or misidentify/misrepresent issues involved. Leaving the responsibility to DEC will ensure accurate and consistent information.” *Environmental consultant*
- “Source site owners may have varying degrees of communication skills and communications may be confusing. To ensure certainty and accuracy, DEC should inform affected owners. Under or over reporting has the potential to cause unwarranted concern, which is particularly pertinent on residential property owners.” *Environmental consultant*
- “Should source site owners be the party to inform affected site owners, a conservative approach may be adopted when determining other properties that might be affected.” *Local government*
- “DEC should be responsible to notify affected parties to ensure that the information provided is current and any implications of the contamination are outlined clearly.” *State government*
- “It would be difficult to administer, verify and track.” *Environmental consultant/contaminated sites auditor*
- “DEC notifying affected owners will provide some assurance that the source site landowner/occupier or polluter is being held accountable.” *Industry*



## 9. Contaminated sites auditors

Contaminated sites auditors accredited by DEC provide independent advice on the acceptability of investigation and remediation work carried out by contaminated land consultants. Auditors review each stage of investigation and/or remediation works and submit a mandatory audit report to us on their findings. We asked:

### Is the role of the contaminated sites auditor sufficiently clear?



There were 18 responses to this question with the majority reporting that they understood the role of the contaminated sites auditor. Some of the comments received are shown below:

#### Agreed:

- “Yes – although auditors need to be continually reminded that their primary role and responsibilities are to DEC. This means no advocacy, no support beyond that provided in the guidelines, and the provision of clear, concise, independent and CRITICAL review of all submissions.” *Environmental consultant*
- “Yes, but some further clarification on where the responsibility lies in ensuring the auditors recommendations are addressed before further development is undertaken may be required.” *State government*

- “Yes. The standing of auditors is such that their reports/opinions can be relied upon as part of sale and lease negotiations.” *State government*
- “The role of the auditor is clear, however, some of the interaction between agencies (regulators) and the auditor require clarification. There is often little liaison between the auditor, investigating consultants and the agency (or even the local DEC office). Little input is sought from the agency on the recommendations made by the investigating consultants who report to the auditor.” *State government*

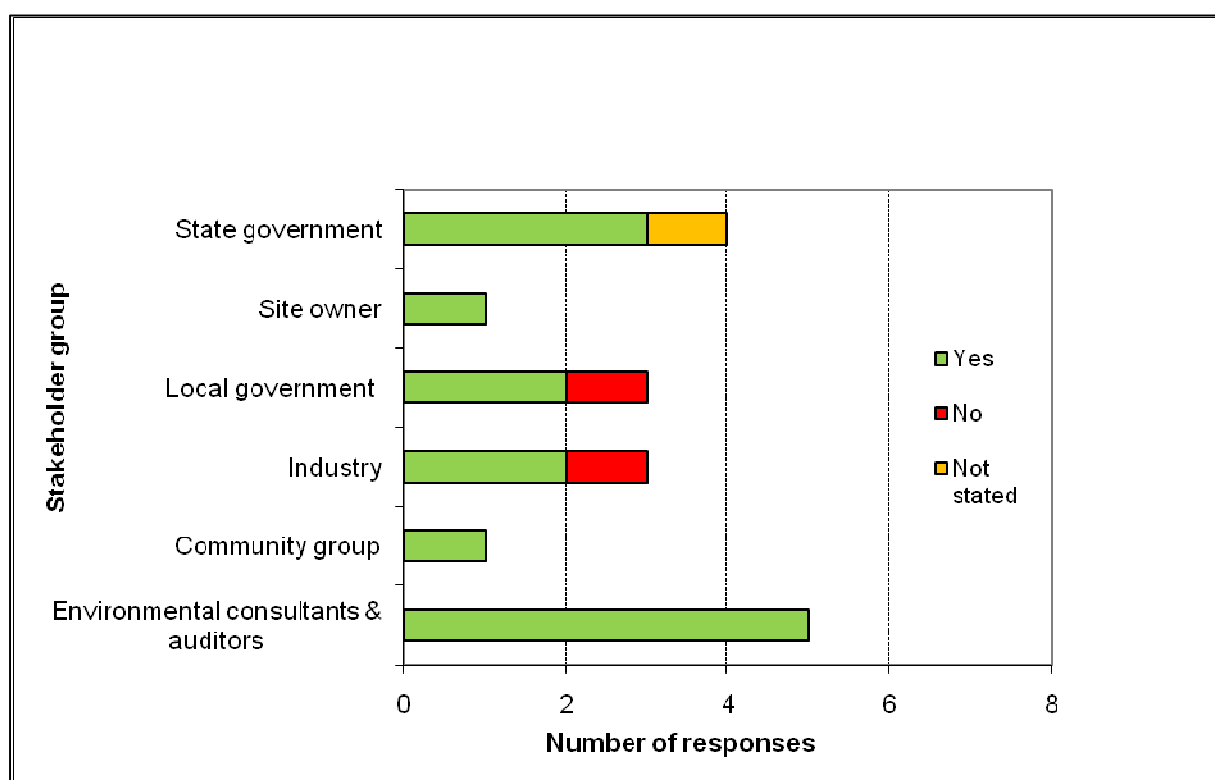
**Disagreed:**

- “The position of the auditor under the WA Contaminated Sites Act should be reviewed. If an auditor is required for a site and has reviewed all investigations in detail, they should be best placed to make a decision on reclassification of the site.” *Industry*

## 10. Contaminated Sites Committee

The Contaminated Sites Committee is an independent statutory body that makes decisions about responsibility for remediation of contaminated sites, disclosure statements, and determines appeals against certain decisions made by the Director General of DEC. The Committee aims to manage the application and appeal processes efficiently, effectively and fairly, without legal technicality or formality. We asked:

**Should there be a time limit and requirement for all relevant documents to be sent to the Committee to decide on the responsibility for remediation?**



There were 17 responses to this question. The majority agreed that there should be a time limit for providing relevant documents to the Committee. Before the Act commenced, it was estimated that decisions by the Committee on responsibility for remediation would take approximately six months. In practice, this process on average is taking two-and-a-half years, often because not all available information is submitted at the start of the decision-making process. Most respondents favoured a three-month time limit for parties to present relevant

documents to the Committee, with some suggesting the provision to negotiate an extension if necessary, particularly in complex cases. Some of the comments received are shown below:

### Agreed:

- “There should be a statutory timeframe with documents received beyond that date not considered in final decision process. The current \$1,000 fine for failure to provide documents is insufficient to deter people delaying the process and withholding information that may not support their cause.” *Environmental consultant*
- “Yes, clear time limits should be set for submissions to the Committee.” *Industry*
- “Yes. Delays can result in further negative impacts on health and the environment. A time limit would reduce the amount of delays in determining responsibility. Time frames combined with clear communication would improve the process.” *Local government*
- “Yes, a time limit to prevent continual submissions to the committee is essential to expediency.” *Industry*
- “Yes, a time limit is required to assess the issue otherwise the problem may not be addressed prior to some level of human or environmental impact occurring. This assists the prioritisation of sites to [be] investigated/remediated, ensuring site characteristics are available.” *State government*

### Disagreed:

- This may be difficult for complex matters and what are the repercussions if any set time frame is not complied with. Whilst setting timeframes may seem like a good idea it may lead to other issues and so should be left as it presently stands. *Local government*
- A penalty for failure to provide the relevant documentation could be that that party automatically becomes responsible for remediation, as per s.54(1)(c) of the Act, where, if an owner or occupier refuses entry to the site it automatically becomes responsible for any remediation required. *State government*
- “The objective should be to have a process that results in a timely conclusion rather than an endless process. Introducing a process where parties have, say, only one opportunity to rebut within three months would assist.” *Industry*

## Reviewing the Act – what's next?

This summary is a brief overview of the submissions received in response to our consultation paper on the review of Act. We are analysing the feedback and comments received during this first round of community consultation and will release a discussion paper inviting further public comment. The discussion paper will focus on the issues identified during the consultation process and propose potential solutions.

Updates on the review process will be posted on our website – please check our [Contaminated Sites Act Review](#) page for details.

## **Annex 1 – Respondents**

Association of Mining and Exploration Companies (AMEC)

BP Australia Pty Ltd

Burns, Chris

Celedge/Paul Stallwood

City of Bayswater

City of Belmont

City of Swan

Coffey Environments Australia Pty Ltd

Cooperative Research Centre for Contamination Assessment and Remediation of the Environment (CRC CARE)

David E. Jackson Peer Review Services

Department of Environment and Conservation

Department of Health

Department of Regional Development and Lands

Department of Water

East Metropolitan Regional Council

Elkington, Amy

Emerge Associates

Emission Assessments Pty Ltd

Fremantle Port Authority

Kwinana Industries Council

LandCorp

Landgate

Law Society of Western Australia

Lionsville Denmark Inc.

Parsons Brinckerhoff

Shell Company of Australia Ltd

Swan River Trust

Urban Development Institute of Australia, WA (UDIA)

WA Local Government Association (WALGA)

Water Corporation

Western Power