

# Our Environment

## Workshop: Site Contamination Policy & Operating Guidelines

Purpose:

To discuss a review of the City of Adelaide's Site Contamination Policy and Operating Guidelines

20 August 2024

Park Lands, Policy & Sustainability

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# Site Contamination Policy & Operating Guidelines

## Key Messages



The review of the Site Contamination Policy and Operating Guidelines:

- Delivers up-to-date Policy documents
- Assists in ensuring organisational compliance with legislative and regulatory obligations
- Confirms Council's management framework for site contamination
- Clarifies the roles and responsibilities of the City of Adelaide (CoA), the South Australian Environment Protection Authority (the EPA), site contamination practitioners and other statutory bodies in the identification, investigation and remediation of site contamination in the City of Adelaide
- Clarifies the roles and responsibilities for management of site contamination by Administration

## Question

What are Council Members' views on whether the Site Contamination Policy clearly articulates Council's approach to managing site contamination?

# Policy Scope

The Policy provides a framework to mitigate, remediate or manage site contamination (as defined Section 5B of the *Environment Protection Act 1993* (the EP Act) (SA)) that poses a risk to human health and the health of natural environmental systems on property that is:

- Owned by CoA - where CoA owns, occupies and manages land, including land where CoA is the landlord
- Controlled by CoA – including dedicated Crown land and other land for which the CoA is custodian, occupier, user, lessee or license
- Private land – where the development of land (by application) or statutory land-use planning (by process) triggers a change of use that may invoke consideration of site contamination.

# Site Contamination Policy & Operating Guidelines

## Site Contamination Management Context



### Risk:

- Site contamination poses public health and environmental risks
- Historical waste management practices have left chemical contamination in soil and groundwater

### Guidance:

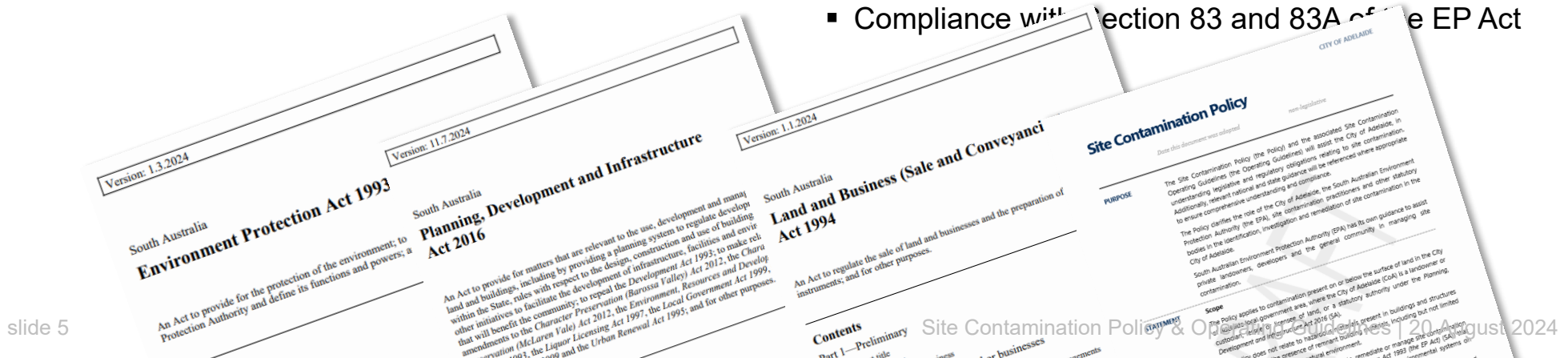
- The Site Contamination Policy guides the Council in minimising risk
- Operating Guidelines establish a framework of internal controls that support the Policy's implementation and mitigate risks

### Relevant Legislation:

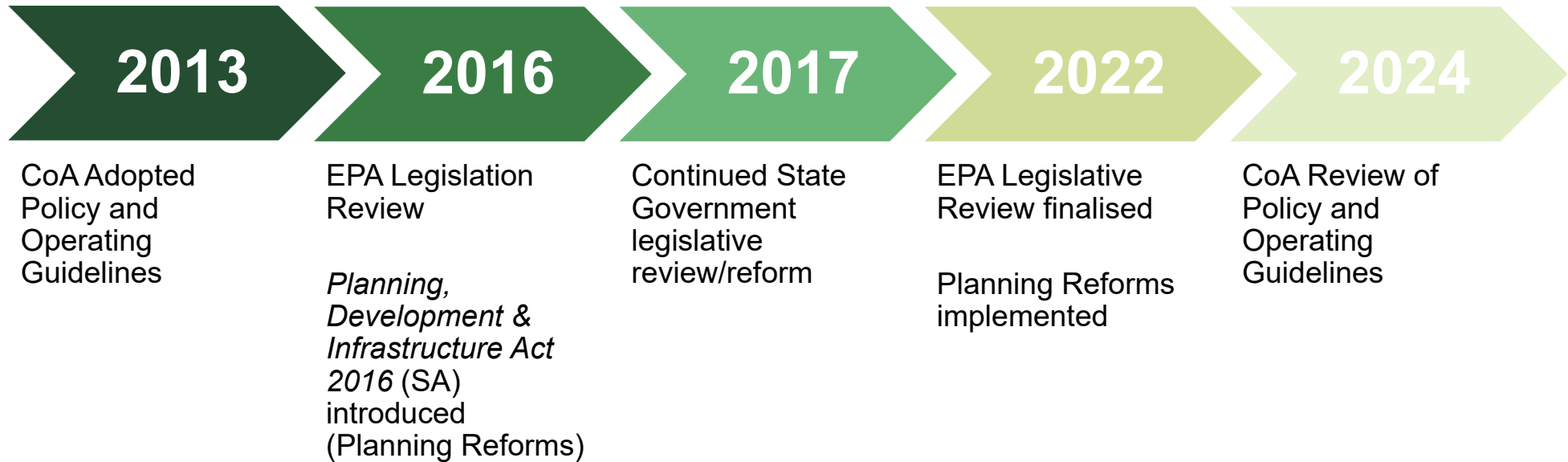
- *Environmental Protection Act 1993 (SA) (EP Act)*
- *Planning, Development and Infrastructure Act 2016 (SA)*
- *Land and Business (Sales and Conveyancing) Act 1994 (SA)*

### Responsibilities:

- General environmental duty under Section 25 of the EP Act.
- Compliance with Section 83 and 83A of the EP Act

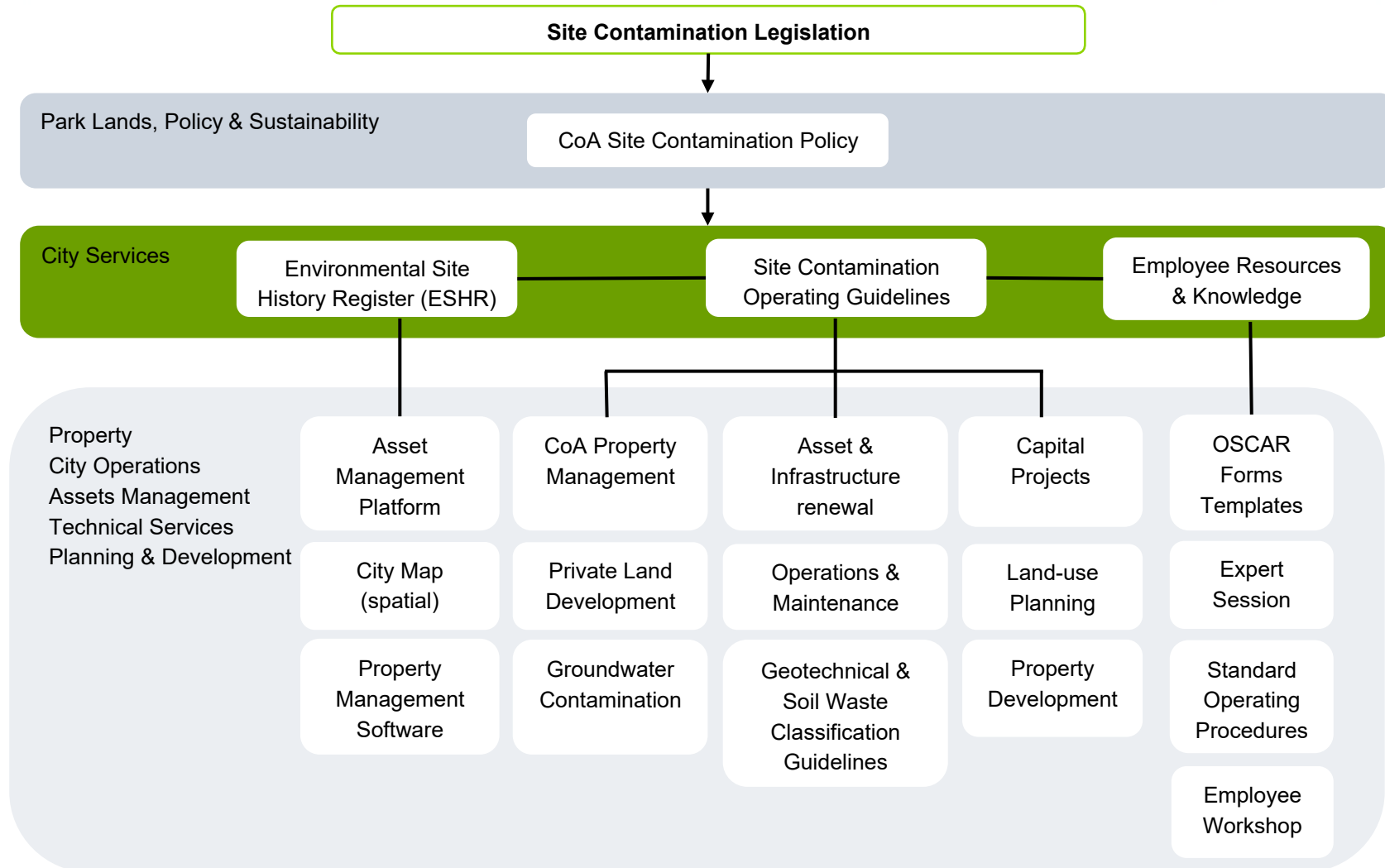


# Site Contamination Policy & Operating Guidelines Review Process & Consultation



# Site Contamination Policy & Operating Guidelines

## Site Contamination Management Framework



# Site Contamination Policy & Operating Guidelines

## Responsibilities across CoA

- Update Council Policy and Operating Guidelines Advise on contamination processes and procurement

**Associate Director,  
Park Lands, Policy &  
Sustainability**



- Manage ESHR and develop spatial data layer
- Support procedural contamination matters
- Liaise with EPA and consultants

**Associate Director,  
Infrastructure**



- Include contamination in risk assessment
- Manage and update ESHR including spatial data layer
- Engage contamination experts and report incidents

**Managers  
Infrastructure Delivery,  
Technical Services,  
and Infrastructure**



- Engage consultants/auditors
- Manager and report contamination issues

**Project Managers  
(contracted by CoA)**



- Ensure onsite operations follow contamination guidelines
- Report any discovered contamination incidents

**Associate Director,  
City Operations**



- Access ESHR for development assessment
- Ensure adherence to planning conditions for contamination

**Associate Director,  
Regulatory Services**



- Manage property asset monitoring requirements
- Submit monitoring reports to ESHR

**Associate Director,  
Strategic Property and  
Commercial**



- Advise community and respond to media on contamination issues

**Manager, Customer &  
Marketing**





# Triggers and Responses to contamination

## Triggers

- Historical contamination activities
  - Past industrial activities and spills
  - Outdated waste disposal methods
- Changes in land use or development applications.
  - New construction projects
  - Rezoning of land areas

## Responses

- Preventative measures under Section 25 of the EP Act and proactive monitoring and site assessment
- Management and remediation practices containment strategies, monitoring and maintenance
- Use of qualified professionals for assessment and remediation



Slaughterhouse and associated holding yards  
Bonython Park / Tulya Wardli (Park 27)

# Triggers and Responses to contamination

## Chief Executive Officer

Responsible for Council's site management practices are in accordance with the policy

## Infrastructure and Public Works Committee

Considering matters related to site contamination on CoA owned land

## Leadership Team

Implementing policy, managing land, protecting health and safety, prudent and diligent land-use planning

## Administration

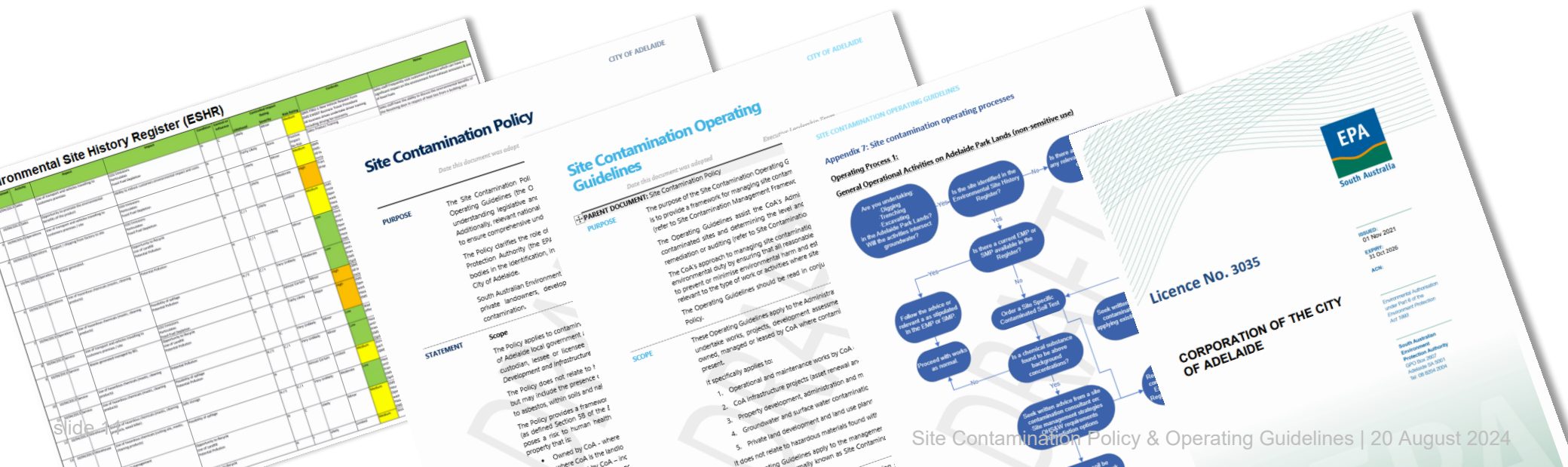
Responsible for ESHR and mitigate, remediate or manage site contamination

# Site Contamination Policy & Operating Guidelines

## Triggers and Responses to contamination

### What we have in place

- ESHR
- Updated Policy and Operating Guidelines to reflect new legislation
- Procedures and processes for staff and contractor risk assessment, approvals, and communications for site contamination
- Management Plans for site contamination



## Next Steps

### Council decision

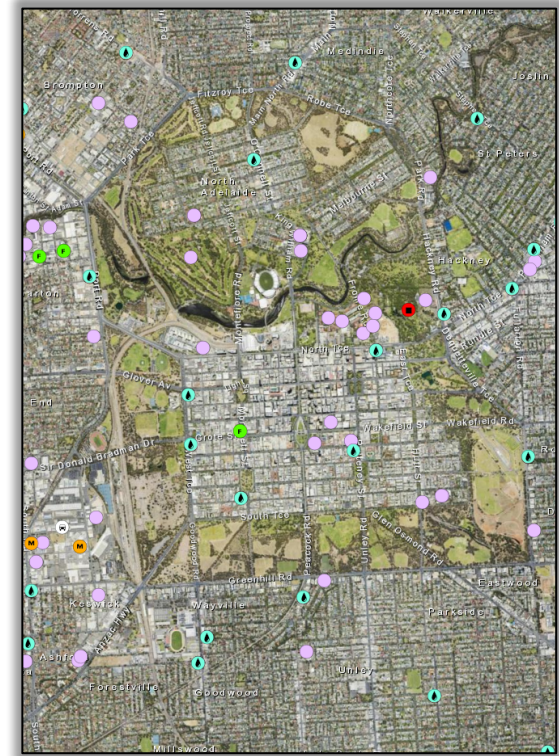
- Report to City Finance and Governance Committee in September
- Council decision on the Site Contamination Policy in September

### Implementation

- Embed the framework into operations
- Update the ESHR

### Development

- Create a spatial layer within the Council's systems for the ESHR for better data management
- Schedule review of Policy and Operating Guidelines for 2029



LocationSA Map Viewer: EPA Licensed Activities

## Question

What are Council Members' views on whether the Site Contamination Policy clearly articulates Council's approach to managing site contamination?