

The National Remediation Framework

– expert and stakeholder input



CRC CARE

*A safer, cleaner
environmental future*

Bruce Kennedy
CRC CARE

NRF National Roadshow

February 2019

National Remediation Framework

Overall development timeline

2011	established NRF Steering Group
2012 – 2013	foundation work for NRF
2013 – 2017	development/release/consultation on specific draft guidelines
2017 – 2018	'harmonisation' exercise
Nov 2018	release of complete NRF package for consultation
2019	consultation, roadshow, finalisation

<http://www.crccare.com/knowledge-sharing/national-remediation-framework>

National Remediation Framework

Information dissemination, opportunities for input 2012-2018

- information papers for
 - Heads of EPAs (HEPA)
 - industry
- Remediation Australasia
- Technical Reports at www.crccare.com
- release of draft guidelines on www.crccare.com
- stakeholder representatives – NRF Steering Group
- presentations
 - industry briefings (ALGA, ASBG, MBA, MCA, petroleum)
 - Government agencies, HEPA
 - Clean-up conferences – 2011 to 2017
 - webinars
 - international conferences (Europe, UK, USA)

National Remediation Framework

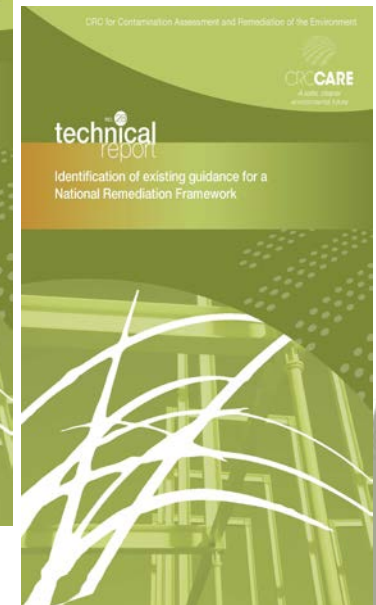
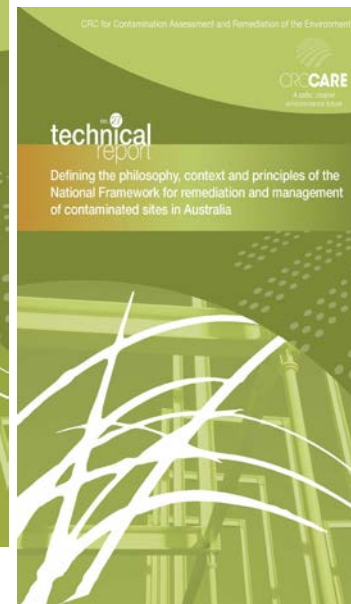
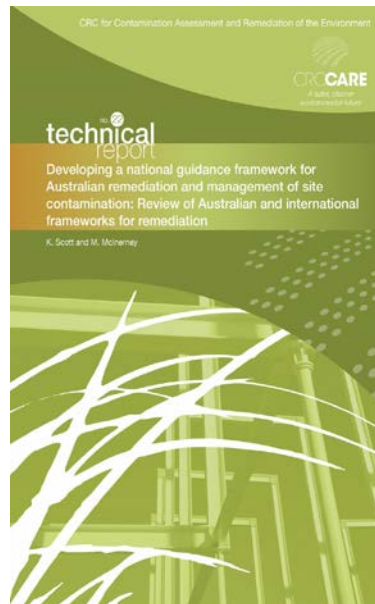
Foundation work

NRF Steering Group

- established 2011

Foundations - prior to guideline development 2012 - 2013

- frameworks review
- context and philosophy
- guidance mapping



[https://www.crccare.com/
publications/technical-
reports](https://www.crccare.com/publications/technical-reports)

National Remediation Framework Schematic

PHILOSOPHY	CONTEXT				
	Background	Jurisdictional arrangements	Legislative powers	Purpose of framework	Intended audience
	PRINCIPLES				
	Precautionary		Prevention		Risk management
	Options hierarchy		Sustainability		National / international obligations
	Polluter pays		Inter-generational equity		Waste minimisation
PRACTICE	GUIDANCE				
	Remediation (action) plan Development		Remediation (action) plan Implementation		Post-remediation
	Regulatory considerations		Health and safety		Remediation validation and closure
	Remediation objectives		Stakeholder engagement		Long-term monitoring
	Remediation Options Assessment		Documentation and record-keeping		Auditing/third party review
	Technology Guides (13)				Institutional controls
	Cost-benefit and sustainability analysis				

National Remediation Framework

Input of expertise and stakeholder views

Consultants – development of initial draft guidelines

- preparation of specific initial draft guidelines
- selected on basis of expertise and ability to deliver

Initial draft guidelines

- 24 draft guidelines, developed as resources permitted

NRF Steering Group

- provided feedback on specific initial draft guidelines prepared by consultants [in some instances required several iterations]
- approved specific draft guidelines for release for consultation with:
 - governments, industry, practitioners and public.

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Release dates – specific draft guidelines

Draft guidelines

2013

- Health and safety

2014

- Stakeholder engagement
- Documentation and record keeping

2015

- Remediation options assessment
- Technology Guides (13)
- Cost-benefit and sustainability analysis

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Release dates – specific draft guidelines

Draft guidelines

2016

- Remediation options assessment [re-released]
- Technology Guides (13) [re-released]

2017

- Remediation validation and closure
- Long-term monitoring
- Auditing/third party review
- Institutional controls

- Remediation objectives
- Regulatory considerations

National Remediation Framework

'Harmonisation' and updates

'Harmonisation' of draft guidelines

2017 – 2018

- in relation to other draft guidelines
 - ensure appropriate links between them
 - ensure that each provides a complete approach
 - consistent terminology
- in relation to the NEPM
 - ensure compatibility and consistency with NEPM
- refinements using feedback received on individual guidelines
 - comments were placed into comments registers (available on request)

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'Harmonisation' and updates

Our approach:

- consistent language/terminology
- remove repetition/be concise
- place detail in attachments
- 'usability'
- flow charts and checklists

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'Harmonisation' and updates

Feedback on draft guidelines –

compiled into a comments register

- 24 guidelines
- 44 submissions
- 897 comments

Updates

- 897 comments addressed
- 182 harmonised abbreviations
- 223 harmonised glossary terms
- 588 references

Outcomes – consistent

- format/layout
- abbreviations and terminology (glossary)
- references
- eliminated repetition / moved content as appropriate
- flow of text
- linkages



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'Harmonisation' and updates

A highlight from updating exercise:

- **Movement of some content between guidelines**
 - when viewed as a package, it was clear that some material was better placed elsewhere
for example: validation of specific remediation technologies moved to individual Tech Guides
 - comments register - consultation comments on the content which was moved:
 - were maintained and answered within the comment register for the original guideline
 - noted in the comment register as having been moved
[moving the content often addressed the comment]

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Where are we now?

All draft guidelines in this complete package have been updated and harmonised.

Any further comments resulting from this consultation will be considered as part of a final update process.

Any comments should be made **by 31 March 2019**. This date is fixed.

Treatment of comments:

- where comments can be readily taken into account, they will be.
- where comments deal with substantive issues, such as medium-longer term changes to legislation, they will be parked for future consideration (see later slide)

The final update process will also incorporate weblinks between guidelines and references to the NEPM.

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Where are we now?

Once submissions have been taken into account and weblinks inserted, the complete package will be considered by the NRF Steering Group.

The NRF Steering Group is expected to meet mid-2019.

It is expected that the Steering Group will consider:

- endorsement of the NRF package, and
- referral to HEPA (and NCEN)

NATIONAL REMEDIATION FRAMEWORK

Just to recap...

- initiated by regulators
- extensive development process, including regulators and industry
- will provide practical advice to practitioners (and to regulators)
- will sit alongside state requirements
- does not intrude on state requirements

National Remediation Framework Beyond 2019

Update of Framework and constituent guidelines

- future updates on an as-needs basis
- note:
 - modular structure
 - non-legal status
- incorporation of other guidance eg flux

National Remediation Framework

What now?

Should you wish to make a submission, please send to

Dr Joyti Jit
CRC CARE

at joytishna.jit@crccare.com

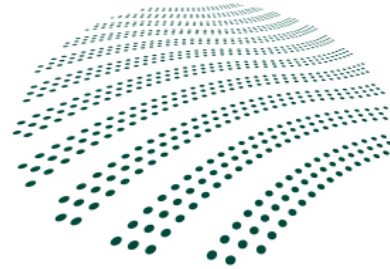
to reach her by **31 March 2019**.

Acknowledgements

- CRC CARE partner organisations
- NRF Steering Group members
- consultants
- all jurisdictions
- ...you, for your feedback!



Thank you



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