

## MANAGEMENT OF CONTAMINATED LAND POLICY

<b>Approval Level:</b>	EMT	
<b>Policy Type:</b>	Organisation	
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<b>Responsible Officer:</b>	Manager Property Services Strategic Property Analyst	
<b>Owner:</b>	Property Services	
<b>Responsible Director:</b>	Presentation and Assets	



<b>Relevant Legislation/Authority:</b>	<p><b><u>City of Greater Bendigo</u></b></p> <ul style="list-style-type: none"><li>▪ Local Government Act 2020</li><li>▪ Local Government Act 1989</li></ul> <p><b><u>Environmental Protection Authority (EPA),</u></b></p> <ul style="list-style-type: none"><li>▪ Environmental Protection Act 2018 (Vic),<ul style="list-style-type: none"><li>▸ Environment Protection Regulations 2021</li></ul></li></ul> <p><b><u>WorkSafe Victoria,</u></b></p> <ul style="list-style-type: none"><li>▪ Occupational Health and Safety Act 2004<ul style="list-style-type: none"><li>▸ Regulations 2017</li></ul></li></ul> <p><b><u>State Government Legislation:</u></b></p> <ul style="list-style-type: none"><li>▪ Planning and Environment Act 1987<ul style="list-style-type: none"><li>▸ Regulations 2015</li></ul></li><li>▪ Ministerial Direction No 1 - 1987</li><li>▪ Public Health and Wellbeing<ul style="list-style-type: none"><li>▸ Act 2018</li><li>▸ Regulations 2019</li></ul></li><li>▪ Crown Land (Reserves) Act 1978</li><li>▪ Land Act 1958<ul style="list-style-type: none"><li>▸ Regulations 2016</li></ul></li><li>▪ Pollution of Waters by Oil and Noxious Substances Act 1986<ul style="list-style-type: none"><li>▸ Regulations 2012</li></ul></li><li>▪ Occupational Health and Safety Act 2004<ul style="list-style-type: none"><li>▸ Regulations 2017</li></ul></li></ul> <p><b><u>Commonwealth Legislation</u></b></p> <ul style="list-style-type: none"><li>▪ National Environmental Protection Council Act 1994 (Cwlth),</li><li>▪ National Environment Protection (Assessment of Site Contamination) Measure 1999</li><li>▪ Work Health and Safety Act 2011<ul style="list-style-type: none"><li>▸ Regulations 2011</li></ul></li></ul> <p><b><u>Safe Work Australia</u></b></p> <ul style="list-style-type: none"><li>▪ Workplace exposure standards for airborne contaminants (2019)</li></ul> <p><b><u>Australian Standards</u></b></p> <ul style="list-style-type: none"><li>▪ Australian/New Zealand Standard for Risk Management (AS/NZS 4360:2004)</li></ul>
<b>DOCSETID:</b>	3932149

## 1.0 PURPOSE

The purpose of this policy is to provide a framework for the City to appropriately manage land contamination in order to:

- 1.1 identify, manage and reduce** risks to human health and the natural environment;
- 1.2** facilitate a transparent and consistent decision-making process in relation to land;
- 1.3** ensure compliance with the relevant legislation;
- 1.4 reduce** financial costs and project delays associated with the City's strategic objectives; and;
- 1.5 minimise** reputational risk.

## **2.0 BACKGROUND**

Bendigo has been a major gold mining city since 1851. Subsequent historic mining activity resulted in significant alteration to the Bendigo landscape including mine-waste (with arsenic naturally occurring around gold mineralisation areas) affecting approximately 3,600 hectares of land, most of which is Crown land, but some urban areas are now considered to have development potential.

Land can also be contaminated by other uses. Whilst the areas impacted by mining activities around Bendigo are usually distinguished by vacant Crown land, the identification of former industrial sites is not so easily distinguished. A list of industry types and commercial activities with a high and medium potential for contamination is provided in the *General Practice Note - Potentially Contaminated Land, June 2005 (DSE)*.

*Note: Given that Bendigo and surrounding regions have a significant mining history, anywhere around Bendigo is likely to be "potentially" contaminated. Discovering contaminants in soil does not automatically mean a site is dangerous to health. Based on an investigation of the degree (level) and extent (spread) of soil contamination and if the site suitable for its intended use.*

## **3.0 SCOPE**

- 3.1** This policy applies to all land within the Greater Bendigo municipality where Council has responsibilities, including:
  - 3.1.1** City owned and/or occupied freehold land and reserves;
  - 3.1.2** Public (Crown) Land where the City is the appointed land manager;
  - 3.1.3** All Land that is to be Acquired, Transferred or Divested; and;
  - 3.1.4** Road Reserves where the City is the coordinating road authority.
- 3.2** This policy does not apply to:
  - 3.2.1** Freehold land that is not owned and/or occupied, or controlled by the City;
  - 3.2.2** Crown Land where the City are not the appointed managers;

- 3.2.3 Land that is currently regulated by the EPA and utilised for Waste Management (i.e. landfill and transfer stations);
- 3.2.4 Buildings and improvements located on the land which are affected by asbestos as asbestos contamination are identified, managed and controlled under the City's Asbestos Management Policy; and
- 3.2.5 Road Reserves where the City is not the coordinating road authority.

## 4.0 DEFINITIONS

In this policy:

**City** means the Greater Bendigo City Council, being a body corporate constituted as a municipal Council under the Local Government Act 2020 (Vic).

**Council** means all of the Councillors collectively.

**Councillor** means the individual holding the office of a member of Greater Bendigo City Council

**CONTAMINATION** means the condition of land, air or water where any chemical substance or waste has been added as a direct or indirect result of human activity at above background level and represents, or potentially represents, an adverse health or environmental impact. Contamination could potentially represent a 'potential' or 'actual' risk to health or the environment. Contamination can affect land, ground water, above-ground stormwater runoff and/or underground water table as well as creating leachate and gases.

**4.1 CONTAMINATION STATUS** means the status (or level) of land contamination of individual sites that has been assessed and classified into the categories below:

- 4.1.1 **Potentially contaminated land (PC) – Further Investigations Required** – (*Property has been assessed by the Property Environmental Risk Rating Tool (PERRT) more information is required to confirm or dismiss the possibility of contamination - (per: Ministerial Direction No 1) land used or known to have been used for industry, mining or the storage of chemicals, gas, wastes or liquid fuel (if not ancillary to another use of land). The practice note also deals with land that may have been contaminated by other means such as by ancillary activities, contamination from surrounding land, fill using contaminated soil or agricultural uses". Given Bendigo's mining history and the above definition, anywhere in Bendigo could be "potentially" contaminated.*)
- 4.1.2 **Contaminated (Restricted Use) Land (C-RU)** – means land contaminated by a hazardous contaminant (such as heavy metals, asbestos, pesticides and/or hydrocarbons) which may pose a "potential" risk to human health or the environment and which has been formally assessed for site contamination i.e. where a detailed site assessment has led to a Site-specific health risk assessment (HRA) (including Hazard Assessment and Exposure Assessment) to provide a Risk Characterisation. The site is contaminated but suitable for limited uses (e.g. the site may be suitable for commercial use only, or for residential use with conditions).
- 4.1.3 **Significantly Contaminated Land (SC) – (Remediation Required)** (*sometimes referred to as "Polluted"*) – land that may present an "unacceptable" risk to human

health, surrounding lands or the contiguous environment. Where a Government agency occupies land that is polluted, it may be required to address the pollution in accordance with the requirements of the Environment Protection Act 1970 (Vic).

- 4.1.4 **Remediated (Restricted Use) Land (R-RU)** – the site was contaminated but has been cleaned up to a standard where it is suitable for limited uses (e.g. the site may be suitable for an apartment block, but not for a kindergarten).
- 4.1.5 **Decontaminated Land (D)** – (Unrestricted Use) the site has been remediated and is suitable for all uses. It does not pose a risk to the environment or human health.
- 4.1.6 **Not Likely to be Contaminated (NL)** – (Unrestricted Use) – means after a formal Environmental Site Assessment has been undertaken by a qualified environmental assessor, no contamination was found at the site or the likelihood of contamination is low.
- 4.1.7 **Unclassified (UNCLASSIFIED)** – means land which is yet to be formally investigated. *All land starts off as unclassified until assessed by PERRT.*

**Note:** the classifications of “Unclassified” and “Potentially Contaminated” are determined by the PERRT, the remainder require a formal environmental site assessment including soil samples by a qualified environmental consultant

- 4.2 **DESKTOP INVESTIGATION** means a high-level investigation undertaken with (where possible) or without a physical inspection of the site, including the use of the PERRT tool, historical investigations/searches (including historic aerial photos), internal feedback, mapping and other sources.
- 4.3 **EPA** means the Environmental Protection Authority Victoria.
- 4.4 **LAND** – means freehold land and reserves, Public (Crown) land including Road drainage and other Reserves.

**COUNCIL LAND** means land that is owned or managed by the City.

**LAND CONTAMINATION STATUS REGISTER** means the City’s electronic register which identifies the status (or level) of land contamination of individual sites as defined by the Contaminated Land Classification definitions in Section 4.1.

## LAND TRANSACTIONS

- **ACQUIRED** means Purchase or Compulsory Acquisition,
- **DIVESTMENT** includes the transfer and gifting (transferred either to the City or from the City) either through the transfer of land management Public (Crown) land committee of management, reserve transferred through subdivision process (i.e open space and recreation reserves) or transfer of freehold land.
- **DISPOSED** means Sale.

**LIKELIHOOD** means the “probability” of contamination of soil, gas or groundwater being present at the property as a function of current and previous land uses, the known presence of

potentially contaminating activities or infrastructure and other factors likely to result in contamination;

**PERRT** means Property Environmental Risk Ranking Tool developed for the preliminary assessing of land via desktop assessment to enable ranking of each property via a risk ranking to facilitate prioritization of further site-specific environmental assessments in greater detail. The PERRT tool considers ground water, water tables, past history, EPA priority sites, zoning, past and current uses, neighboring uses, adjoining water bodies etc. to determine both a likelihood of Contamination as well as a risk ranking.

**RISK RANKING:** *(Used to facilitate further assessments)* **NOTE:** *Refer Section 4.1 For the actual contamination status.* This ranking is to enable the prioritising of further assessments and means the ranking assigned by a “desktop” assessment of all council owned/managed properties using the PERRT tool. **These rankings do NOT reflect the actual level of contamination on the property.** the ranking simply reflects the likelihood of contamination and land sensitivity and is presented as one of five risk classifications:

**Low:** Based on the available information there is little reason for concern with regards to contamination at the site;

**Medium:** Based on the available information: Further investigation of contamination at the site should be carried out in due course;

**High:** Based on the available information: There is good reason to believe that unacceptable risks may be present at the property, and these should be assessed;

**Very high:** Based on the available information: Prompt assessment is recommended *(and as a result of the assessment recommendations take further formal assessments and actions as required)* as a matter of priority to investigate and manage risks at the property; and

**Critical:** Based on the available information: a formal assessment is required to assess the actual level and risk of contamination and as a result of the formal assessment recommendations take further immediate action to ensure that highly sensitive populations are protected.

**GENERIC ENVIRONMENTAL MANAGEMENT PLAN (GEMP)** means the singular overarching management plan for all Council land.

**ENVIRONMENTAL SITE MANAGEMENT Plan (ESMP)** means the individual site-specific management plan and communication plan for sensitive sites or sites undergoing development.

**SENSITIVITY** means the extent to which the property or its surroundings is likely to be affected by any contamination that may be present. This variable is affected by the presence of sensitive human receptors (such as children or neighbours relying on groundwater), ecological values (such as streams or conservation areas) and also community expectations.

**SENSITIVE USES** means childcare centre, pre-school or primary school; residential use; public open space/ recreational use; the natural environment (waterways, forests); agriculture; retail or office.

**STATUTORY PLANNING** means the Statutory Planning Unit of the City of Greater Bendigo.

**THIRD PARTY** means the individual body corporate who is not acting for the Greater Bendigo City Council.

**GOVERNMENT AUTHORITY** means the body responsible for contaminated land requirements.

**WASTE MANAGEMENT** means specific statutory waste services provided by the City undertaken on land for landfill, recycling and waste disposal and is regulated and licensed by the EPA.

## 5.0 PRINCIPLES

- 5.1** The City is committed to adopting a risk-based approach to reviewing, managing and implementing its policies and practices to identify current contamination status and prevent further land contamination.
- 5.2** The City is committed to ensuring any land use changes will not increase risk to human health or the environment. If Council Land has contaminated soil and is a potential public health risk, then the City will be responsible for managing the potential hazard, however in the event that another entity has caused the contamination, the City will endeavor to seek restitution from the original polluter.
- 5.3** The City will also have regard to the following principles in the sale, management or disposal of Council owned land:
  - 5.3.1 Compliance with the Local Government Act and other legislative requirements. The City will adhere to the legislative requirements regarding contaminated land, ground water, leachate, gas, above-ground stormwater runoff and/or underground water table issues and that the legislation will overrule this policy to the extent of any inconsistency.
  - 5.3.2 Compliance with the Assets and Surplus Land Disposal Policy 2018.
  - 5.3.3 Compliance with the Asbestos Management Policy.

## 6.0 POLICY

### 6.1 Assessment & Management Principles

This section outlines the assessment and management (including identification, recording and risk ranking) of Contaminated Council Land.

- 6.1.1 The City will conduct a Desktop Investigation on a site by site basis using the *Property Environmental Risk Ranking Tool (PERRT)* of all Council land.
- 6.1.2 Any land that has been assessed and given a Contaminated Land Classification (as per Section 4.1) will:
  - 6.1.2.1 be recorded, classified, ranked and mapped on the City's electronic systems; and;
  - 6.1.2.2 be managed in accordance with the GEMP and Communication plan which are to be registered on the City's Electronic Contents Management (ECM)



system against the property address and a link provided in the **Land Contaminated Status Register** Exponare mapping system layer.

6.1.2.3 Develop a site specific ESMP and communication plan for individual properties when the site is to be developed, change of use of the site or a specific risk has been identified provided in the **Land Contaminated Status Register** and exponare mapping system layer.

6.1.3 Once Contaminated Land has been identified, ranked and recorded (as per the classifications in Section 4.1), a project proposal will be submitted for consideration to provide funds to:

6.1.3.1 undertake required technical assessment (Preliminary Site Investigation (PSI)) by an appropriately qualified professional as required by legislation.

6.1.3.2 initiate further testing as required.

## **6.2 Communication**

6.2.1 When communicating on contaminated land, the approach taken should be consistent with the National Environment Protection (Assessment of Site Contamination) Measure.

## **6.3 Purchase, Transfer and Divestment of Ownership of Land**

6.3.1 Council may dispose of surplus property assets (excluding Crown Land) through sales, exchanges or transfers. Note: Crown Land is administered through the Crown Land Reserves Act and if surplus to Councils needs is handed back to the relevant Government Authority to administer.

6.3.2 **Acquisition or Transfer to the City:** The City will not purchase or accept responsibility over land (freehold or Crown land) which is contaminated or has been partially or fully remediated **unless**:

6.3.2.1 legislative and human health risks have been established. To establish this, the City will undertake appropriate assessments of the property;

6.3.2.2 full disclosure is made, and an acceptably prudent transfer of financial remediation costs and environmental risks can be established; **and/or**;

6.3.2.3 site management, remediation costs and identified environmental/contamination risks are fully covered by the vendor or a third party; **and/or**;

the costs of remediation (and other identified implications) including a detailed site audit have been fully established and Council resolves to purchase the site after being fully informed of the strategic alignment and community benefit versus the ongoing costs, environmental and health implications of acquiring the site.

6.3.3 **Divestment or Transfer from the City:** The City will not gift, divest or transfer 'freehold' land or transfer managed Public (Crown) land which is contaminated and has not been remediated unless:



- 6.3.3.1 legislative and contamination risks can be established. To establish this, the City will undertake appropriate assessments of the property;
- 6.3.3.2 full disclosure is made, and an acceptably prudent transfer of financial and environmental risks can be established; and/or;
- 6.3.3.3 site management and remediation costs and risks are fully covered by the recipient, purchaser or a third party.

#### **6.4 Third Party Works: Works Proposed to be Undertaken by Third Parties (not acting for Council) on Council land:**

- 6.4.1 Where works are requested/proposed to be undertaken by third parties (i.e. developers, adjoining owners, utility providers), on Council land, such approval will only be granted on the following basis:
  - 6.4.1.1 Land manager must be consulted and written consent from the land manager must be obtained;
  - 6.4.1.2 the level of risk and exposure to the City has been carefully considered in the event that the discovery of site contamination triggers the obligation for remediation and public/EPA disclosure obligations;
  - 6.4.1.3 legislative and human health risks have been established. To establish this, the City will undertake appropriate assessments of the property at the third parties cost;
  - 6.4.1.4 full disclosure is made, and an acceptably prudent transfer of financial remediation costs and environmental risks can be established;
  - 6.4.1.5 site management, remediation costs and identified environmental/contamination risks in line with EPA obligations are fully covered by the third party; and/or;
  - 6.4.1.6 in the event that the proposed Third-Party works provides a clearly identified community benefit, the City may consider and resolve to allow the Third Party to undertake such works on the site after being fully informed of the strategic alignment and community benefit versus the ongoing costs (including remediation and clean-up costs), environmental and health implications. Costs and responsibilities must be identified and apportioned between the City and the Third Party.
- 6.4.2 Crown Land under Council Management: If the site is Crown Land under management, consent will be required from relevant Government Authority confirming who is liable for any contamination cleanup costs i.e. the Government Authority may require the City to be responsible or it may determine that the proposed use is not suitable.

#### **6.5 Planning Application and Permits requiring Land Transfers for Reserves**

This Section outlines the requirements and investigations that Statutory Planning must undertake when considering development land, including land that is to be vested in the City including public open space reserves, recreation, drainage and other reservations (as appropriate) through the planning and permit applications process.

#### 6.5.1 Applicable plans and strategies:

6.5.1.1 The Greater Bendigo Health and Wellbeing Plan 2017-2021 Goal 2: requires the Greater Bendigo community ... is protected from environmental risks.

6.5.1.2 Public Open Space Contributions Policy 2020 requires an adequate provision of high standard Public Open Spaces that contribute to Greater Bendigo being a more liveable community.

6.5.2 Where suitable, and often associated with larger subdivisions, the City may accept the provision of land for Public Open Space from developers in lieu of a cash Contribution.

6.5.3 Statutory Planning must consider the following requirements when considering development land, including land that is to be vested in the City including public open space reserves, recreation, drainage and other reservations (as appropriate) through the planning and permit applications process.

6.5.3.1 In accordance with the General Environmental Duty (GED) (s.25 - 27 of the Environment Protection Act 2017 (as amended to commence on 1 July 2021) and Ministerial Direction No. 1 - Potentially Contaminated Land requiring information ranging from a preliminary risk screen assessment to an environmental audit (depending on facts and circumstances) will demonstrate that the development, and land to be vested in the City is suitable for its intended purpose.

6.5.3.2 Include permit conditions on permits to ensure that the development inclusive of land to be vested in the City is suitable for its intended purpose.

6.5.4 Where Planning Applications and Planning Permit for land to be developed that require Land Transfers for the provision of Council Reserves including drainage reserves and public open space, Statutory Planning must, in conjunction with the Presentation and Assets Directorate:

6.5.4.1 Ensure that Statement of Compliance is not issued for Plans until the evidence/ requirements noted in 6.5.3.1 and 6.5.3.2 have been satisfied that the development site (inclusive of land vested in the City) is suitable for its intended purpose.

## 6.6 Leasing or Occupying Land

6.6.1 The City will have regard to the following in the management of Council Land:

6.6.1.1 Compliance with the *Local Government Act 2020* (Vic) and other legislative requirements.

6.6.1.2 The City will not occupy land, enter into a lease, accept appointment as Committee of Management which is contaminated or potentially contaminated and has not been remediated unless:

6.6.1.2.1 legislative and contamination risk has been established;

6.6.1.2.2 full disclosure is made, and an acceptably prudent transfer of financial and environmental risks can be established; and/or,

6.6.1.2.3 site management and remediation costs and risks are fully covered by the lessor or owner or the land.

## **6.7 Priority Sites:**

6.7.1 Priority will be given to investigate land presently used for Sensitive Uses.

## **7.0 ROLES AND RESPONSIBILITIES**

### **7.1 Property Services**

7.1.1 The City's Property Services unit will be responsible for the assessment, monitoring and implementation of this policy, including:

7.1.1.1 implementing the **Contaminated Land Assessment Program (CLAP)**;

7.1.1.2 ensuring relevant stakeholders are consulted and informed throughout all stages of the site assessment and management process;

7.1.1.3 establishing and maintaining the **Land Contamination Status Register (Section 4.2)** which records the status of individual sites;

7.1.1.4 conducting ongoing reviews of this policy to maintain its currency; and;

7.1.1.5 auditing the **Land Contamination Status Register** from time to time as sites are identified and investigated.

7.1.2 The Property Services unit may, from time to time, seek guidance and advice from other internal departments around land contamination issues.

### **7.2 Other Internal Departments and Managers**

7.2.1 Where relevant, when other policies are developed or reviewed, consideration should be given to the implications on the policy to be reviewed or developed of the prevalence of potentially contaminated land in the municipality.

7.2.2 Other internal departments may from time to time undertake their own project related contaminated site assessments with the results provided to Property Services for recording. Site specific ESMP's are to be created or updated based on the assessment.

7.2.3 Unit Managers are responsible for the implementation of this policy and ensuring employees and contractors adhere to the policy as appropriate.

7.2.4 In the event of a breach of this policy, the Unit Manager will follow the Managing Misconduct procedure.

7.2.5 Any contamination discovered on a site that is under the management of a unit is the responsibility of that unit.

### **7.3 Employees and contractors**

7.3.1 Are responsible for ensuring employees and contractors comply with this policy as appropriate.

7.3.2 Have the authority to manage Contaminated Land in a manner that ensures their health is not affected, and the health of other persons is not affected, by their activities.

## **8.0 RELATED DOCUMENTS**

Employees are encouraged to access the related internal documents which are available on the intranet and/or external resources which are available as per the below.

These include:



- [Asbestos Management Policy](#)
- [Risk Management Policy](#)
- [Greater Bendigo Municipal Emergency Management Plan](#)
- [The Greater Bendigo Health and Wellbeing Plan 2021-2025](#)
- [Assets and Surplus Land Disposal Policy](#)
- [Public Open Space Contributions Policy 2020](#)
- [Property Sale Checklist 2017](#)
- [Health and Safety Policy](#)
- [Communication Guidelines and Toolkit](#)
- [Community Engagement Guidelines and Toolkit 2016](#)
- [Hazard Near Miss and Incident Reporting Policy and Procedure](#)
- [Health, Safety and Wellbeing Procedure](#)
- [Property Environment Risk Tool \(PERRT\)](#)
- [Local Government 'Best Practice Guideline for the Sale, Exchange and Transfer of Land' \(DPCD June 2009\)](#)
- [Potentially Contaminated Land General Practice Note \(DSE 2005\)](#)
- [Potentially Contaminated Land Planning Practice Note 30 \(DELWP 2021\)](#)
- [National Environment Protection Measure 1999 \(as amended in 2013\) \(NEPM\)](#)
- [Victorian Auditor-General's Report, Managing Contaminated Sites December 2011](#)
- [Managing risks associated with land contamination Guidance for Councils \(Department of Human Services 2006\).](#)
- [Contaminated Environments Strategy \(Environ Protection Auth 2008 Publication 1511\)](#)
- [Planning Measures for Environmental Protection: a practical guide for local Government \(EPA 1994\).](#)
- [Relevant Information Bulletins published by the Environment Protection Authority.](#)
- [State Environment Protection Policy \(Prevention and Management of Contamination of Land\) \(Environment Protection Authority, 2002 - Publication S95\)](#)
- [Climate Change and Environment Strategy 2021-2026](#)

Further information or advice on this policy should be directed to Property Services Unit.

## 9.0 HUMAN RIGHTS COMPATIBILITY

The implications of this policy have been assessed in accordance with the requirements of the Victorian Charter of Human Rights and Responsibilities.

## 10.0 ADMINISTRATIVE UPDATES

It is recognised that, from time to time, circumstances may change leading to the need for minor administrative changes to this document. Where an update does not materially alter this, such a change may be made administratively. Examples include a change to the name of a Business Unit, a change to the name of a Federal or State Government department, and a minor update to legislation which does not have a material impact. However, any change or update which materially alters this document must be made through consultation with the staff Consultative Committee and with the approval of EMT or where required, resolution of Council.

## 11.0 DOCUMENT HISTORY

Date Approved	Responsible Officer	Unit	Change Type	Version	Next Review Date
Aug 2022	BJM	Property Services	Review (Administrative)	2	Aug 2025