

## Review of the Canterbury Regional Policy Statement: Contaminated Sites

### **Purpose**

The purpose of this paper is to discuss options on the approach to be used to review the contaminated sites provisions (found principally in Chapter 7) of the Canterbury Regional Policy Statement (CRPS). The paper brings together the current thinking on the review of these CRPS provisions. It outlines the options and preliminary approaches to be used in the review. Views are being sought on possible policy approaches prior to undertaking detailed analysis or drafting specific wording.

### **Background**

Within Canterbury, there are a number of known contaminated sites and there are likely to be many contaminated sites that have not yet been identified.

Contaminated land is defined by the Resource Management Act 1991 (RMA)<sup>1</sup> as land of one of the following kinds:

- (a) if there is an applicable national environmental standard on contaminants in soil, the land is more contaminated than the standard allows; or
- (b) if there is no applicable national environmental standard on contaminants in soil, the land has a hazardous substance in or on it that:
  - (i) has significant adverse effects on the environment; or
  - (ii) is reasonably likely to have significant adverse effects on the environment.

Currently, there have been no national environmental standards developed that set threshold standards for contamination in soil. As such, contaminated sites are currently identified in accordance with (b).

Sites have become contaminated usually as a result of land use. Sites become contaminated when chemicals are discharged (accidentally or purposely) onto the soil and those chemicals do not break down or dissipate within the soils. Soil contamination can affect a site indefinitely if the contamination is not cleaned up.

Common examples of instances where soil contamination has occurred in the past include areas that were subject to applications of the pesticide DDT (prior to the dangers of this substance being fully understood); and sites that were once timber treatment plants are at high risk of carrying contamination from chemicals used in the treatment process such as arsenic. Many other land uses may also cause contamination, such as sites used to store hazardous substances such as oil or petroleum, orchards and market gardens where large quantities of herbicides and pesticides are used, or submersion style sheep dip sites.

Contamination may extend beyond the site or original area of contamination by way of groundwater seepage, sediment runoff, or airborne dust or vapour. Sites can become contaminated over a short time (chemical spills) or can become contaminated over a long time through the progressive build up of chemicals being applied to the soil (as would occur with fertilisers).

Contamination of a site can limit the use of the land (e.g. vegetation may not easily grow), cause corrosion that may threaten building structures, reduce land value and/or directly endanger the health and safety of people and animals (through direct contact with contaminated soil, swallowing food or water from contaminated environments or breathing vapours or contaminated dust)<sup>2</sup>.

In 2002 Chapter 3 of the Proposed Natural Resources Regional Plan (PNRRP) was notified and in 2004, Chapter 4 was notified. Chapter 3 provides objectives, policies and rules for the management of airborne

---

<sup>1</sup> Resource Management Act 1991 – Part 1 – Interpretation and application

<sup>2</sup> <http://www.mfe.govt.nz/issues/hazardous/contaminated/>

contaminants and Chapter 4 provides objectives, policies and rules for the management of water quality within the Canterbury Region. Included in Chapter 4 are provisions for the protection of water from adverse effects caused by contaminated land or discharges to land.<sup>3</sup>

In 2005 an amendment was made to the RMA which gave regional councils the additional function to investigate land for the purpose of identifying and monitoring contaminated land<sup>4</sup> and Territorial Authorities (TAs) the additional function of controlling actual or potential effects of the use, development or protection of land for the purpose of the prevention or mitigation of any adverse effects of the development, subdivision or use of contaminated land<sup>5</sup>.

The RMA amendment recognises contaminated sites as a matter of resource management significance within New Zealand. In addition to RMA provisions, the Ministry for the Environment has set targets for remediation or management of all high-risk contaminated sites by December 2015.

#### Current CRPS provisions and effectiveness of these

The CRPS provides a policy framework for the management of contaminated sites. Chapter 7 of the CRPS deals with soils and land use. It is not considered that contaminated sites are an issue best placed within Chapter 7. Sites become contaminated usually as a result of hazardous substance use or spill on a site and for this reason it would be more appropriate if contaminated sites were dealt with within the same chapter as hazardous substances. However, as sites can also become contaminated by means other than hazardous substance use (i.e. landfills may not accept hazardous substances but still carry potential to contaminate a site), it may be appropriate for contaminated sites to be places within its own chapter. This is a style choice that will have to be made at the drafting stage.

Included in the issues found in the current Chapter 7 is the following issue dealing with contaminated sites:

*Land use activities which result in soil contamination and consequent adverse environmental effects.*

The resolution of this issue is dependant upon two policies. Policy 7 of Chapter 7 states:

*Any use or activity that has the potential to result in contamination of land should not be established or continued unless effective precautions have been taken to avoid significant adverse effects on the environment.*

Policy 8 states:

*Land that the regional council suspects of being contaminated will be investigated to assess the level of environmental risk. The investigation will determine how land that is contaminated should be managed to avoid, remedy or mitigate the adverse effects.*

The issue statement does not fully describe the extent of issues surrounding contaminated sites. Beyond sites simply becoming contaminated, there are issues surrounding information gathering and release, as well as liability issues with regard to cleaning sites that were contaminated by previous owners. It is considered that the current issue will need to be revised or new issues will need to be added to reflect the full range of issues surrounding contaminated sites.

Overall, it is considered Policy 7 has been effective. There are policies and rules within regional plans that limit and control (through the resource consent process) discharges of contaminants to land. For example Chapter 3 of the PNRRP, Policy AQL6 seeks to avoid nuisance dust (including corrosive, noxious or dangerous dust), and Chapter 4, rule WQL42 deals with the use, storage and removal of underground containers for specified hazardous substances.

It is noted that Chapter 3 of the PNRRP was first notified in March 2002 while Chapter 4 was not notified until July 2004. While the provisions are currently considered effective, this has not been the case throughout the life of the CRPS.

There are some issues with regards to the implementation of Policy 8 which has not been fully implemented.

The investigation of suspected contaminated sites needs to be prioritised as this can only be undertaken as resourcing allows. The use of the term “suspects” may not be appropriate. Environment Canterbury (ECan) can only identify potentially contaminated sites if information is available regarding past land use. There are

---

<sup>3</sup> Proposed Canterbury Natural Resources Regional Plan – Chapter 4 Water Quality – July 2004

<sup>4</sup> Resource Management Act 1991 - Section 30 (1)(ca)

<sup>5</sup> Resource Management Act 1991 – Section 31 (1)(b)(ia)

mechanisms in place for identifying potentially contaminated sites, including a list of activities that could cause contamination within Schedule WQL3 of the PNRRP.

It is noted that ECan's ability to identify potentially contaminated sites relies heavily upon the availability of information regarding past land use. Some of this information is held by TAs who do not always have the resources available to provide information to ECan. This issue needs to be recognised and addressed through the CRPS provisions.

In 1999 ECan produced a Contaminated Site Information Management Strategy<sup>6</sup>. The purpose of the strategy is to ensure consistency in the type of information held and in the availability of that information to interested parties. An outcome of the strategy is the Listed Land Use Register which identifies sites (currently about 3000) that have been used for a purpose that may result in contamination.

With regard to the second part of the policy (being that the investigation will determine how land that is contaminated is to be managed); there has been no implementation of this in practice. ECan has generally not taken the direct role of site management. If a site is determined to be contaminated, it is left to the party responsible for that site to determine how that site should be managed to avoid, remedy or mitigate adverse effects (Section 17 of the RMA can be invoked if necessary).

Section 15 of the RMA states that no person may discharge a contaminant into the environment, unless that discharge is expressly allowed by a rule. It follows that consents are required for discharges of contaminants from contaminated sites. However, this interpretation is controversial and there have been problems with implementation because of this. As such section 15 cannot currently be considered to be effective in the management of discharges from contaminated sites and additional rules may need to be put in place so that resource consent can be required.

Policy 8 needs to be altered to reflect that ECan is not directly involved in the management (remedial works) of contaminated sites.

The CRPS review scoping<sup>7</sup> report identifies a need to update the contaminated site provisions to reflect the RMA amendment addition of Section 30(1)(ca), and additionally, it is considered that the RMA amendment addition of Section 31(1)(iia) (TA functions) needs to be addressed within the CRPS.

## Policy options and discussion

### Issue

The issue does not currently fully describe the full range of issues associated with the management of contaminated sites. Issues surrounding contaminated sites go beyond sites or land becoming contaminated. The issue needs to be updated or new issues need to be added that recognise the following points:

1. Some Information regarding past land use is held by TAs, this information needs to be provided to ECan so that ECan's functions under the RMA can be fulfilled, and as such resourcing is required for this information provision.
2. Potentially contaminated land is identified in desktop studies of past land use using the Ministry for the Environment (MfE) Hazardous Activities and Industries List (HAIL). Such studies do not confirm contamination or levels of contamination. Making information regarding *potentially* contaminated sites available is controversial as land values can be affected.
3. Some contaminated sites have no party who is clearly responsible for the cleanup of the contamination. In some cases, such as sheep dip sites, land has become contaminated by activities required by government legislation. Resourcing the identification and clean up of such sites is a significant issue.
4. On-site testing of potentially contaminated sites needs to be undertaken in order to determine if the site is contaminated and if so what the associated risks of that contamination are. This requires resourcing. Sites need to be investigated before a change of use occurs. TAs or ECan can only demand the investigation when the change of use triggers the need for resource consent.

---

<sup>6</sup> Environment Canterbury (1999) *Contaminated Site Information Management Strategy*

<sup>7</sup> Environment Canterbury (2006) *Canterbury Regional Policy Statement Scoping Report: Report on the issues and approach for review of the Canterbury Regional Policy Statement*

### Policy 7

Policy 7 has not been fully implemented until recently with the notification of the PNRRP. As such, we are only beginning to see the effectiveness of this policy. The policy is given effect to by ECan by way of PNRRP rules and resource consent conditions.

The policy as it stands is consistent with the RMA provisions and it gives effect to the purpose of the Act.

Hazardous substance provisions (found within Chapter 17 of the CRPS) will ensure the policy is given effect to by TAs (i.e. in so far as it will be the particular delineated responsibility of TAs, TAs will control the use of land for the purpose of avoiding or mitigating adverse effects arising from the storage, use transport or disposal of hazardous substances).

It is considered that Policy 7 should be retained.

### Policy 8

Policy 8 is still being implemented and as such, has not been totally effective. There are two major issues that have caused this policy to be inefficient:

- Sites can not be “suspected” of being contaminated unless some investigation into past land use takes place. The identification of potentially contaminated sites is dependant upon information provision, usually the provision of land use history by TAs to ECan, and information collection, by proactive investigation of information sources. There is no policy framework in place to provide for information sharing between TAs and ECan.
- Policy 8 states that “*the investigation will determine how land that is contaminated should be managed*”. ECan does not usually undertake direct management of contaminated sites. It is considered more effective to rely upon the provisions of Sections 15 and 17 of the RMA, along with TA rules to require the party responsible for site contamination to undertake remedial action.

In addition to its inefficiencies, Policy 8 does not currently reflect ECan’s functions as delineated by the RMA.

Policy 8 is in need of revision. There are several options available;

1. Retain the current policy framework with minor alterations to reflect the new RMA provisions (including investigation, identification and monitoring); *or*
2. Change the wording of Policy 8 to reflect current practice in terms of management of sites identified as contaminated; *and*
3. Ensure Policy 8 reflects ECan and TA functions under the RMA; *and*
4. Include a new policy that provides for information sharing between TAs and ECan. This policy could read something like: *ECan will work with TAs to identify sites that are or have historically involved the storage, use or disposal of hazardous substances.*

The wording of such a policy will clearly need to be carefully considered and will need to recognise that not all information is held by TAs; *or*

Address information sharing as a method for achieving a much more broad policy such as: *ECan will investigate land for the purpose of identifying potentially contaminated sites.*

### **Additional new policy options**

The policy framework needs to address the gradual build up of contamination over time. It is not considered that the current policy framework recognises this issue or deals with it effectively. A new policy could be included which would read something like the following:

*Land can be subjected to a gradual build up of contaminants over time. Land that is at risk of becoming contaminated due to gradual build up will be identified and monitored by the regional council and the responsible party will be required to take action to avoid, remedy or mitigate adverse effects.*

Policies may need to be added to address the revised issues. With regard to making information regarding *potentially* contaminated sites available, a decision first has to be made as to whether a policy is needed to resolve this issue or not. Current practice is that information is made available to the public through Property Information Memorandums and Land Information Memorandums. There are sound legal reasons as to why

information is made available in this form. A policy framework could support current practice but may not be necessary and the costs and benefits of creating such a framework need to be carefully thought through.

With regard to responsibility for sites where there is no clear party who is responsible for contamination, there is again the fundamental question of is a policy necessary to resolve this issue. If it is considered that a policy framework is required, then there are several policy options:

1. Have a prescriptive policy that requires the current land owner to be responsible for the clean up of contaminated sites regardless of fault; *or*
2. ECan will work with central government to obtain funding and resourcing for contaminated site clean up; *or*
3. ECan and TAs work together to provide resources for contaminated land clean up.

Option 1 would need to be subjected to legal scrutiny prior to being adopted. There is a lot of case law surrounding liability in this regard and option 1 should not be adopted without further research being undertaken to determine the lawfulness of such an approach.

Option 2 reflects current practice and is therefore preferred. Some central government funding is currently available on a contestable basis to assist with the investigation and remediation of such sites. If this approach is adopted, advocating for more central government funding for contaminated land clean up should be considered as a method.

Option 3 would require both TAs and ECan to provide more resources than are currently provided. This would require strong political buy in from all TAs and ECan.

Should it be determined that a policy framework is required regarding the testing of potentially contaminated sites prior to a change of land use, there are two policy options:

1. Rely on existing Policy 7 and TA functions under Section 31(1)(b)(iia) to resolve this issue
2. Add a new more prescriptive policy that requires investigation of potentially contaminated land to take place prior to building consent as well as prior to resource consent

Option 1 is preferred as it is considered this framework will deal with most situations effectively.

Option 2 will need to be investigated to determine how effective this framework can be. This framework can not be supported within District Plans and will rely on ongoing political buy in from all TAs. Again, this option will also need to be investigated to ensure legal robustness.

## **Recommendations**

Given the findings in relation to the legislative and Regional Plan changes and the recommendations of the scoping report, it is recommended that the review proceeds as follows:

- The issue is altered to reflect the full range of resource management issues and the RMA provisions
- Policy 7 is retained
- Change the wording of Policy 8 to reflect current practice in terms of management of sites identified as contaminated
- Ensure Policy 8 reflects ECan's functions under the RMA
- Consideration is given to whether or not new policies are required to resolve the revised issue. Should it be determined that policy frameworks would be beneficial, policy direction should be considered.

**APPENDIX 1 – STATUTORY CONTEXT**

Section 59 of the Resource Management Act 1991 (RMA) sets out the purpose of a Regional Policy Statement as follows:

*59 The purpose of a regional policy statement is to achieve the purpose of the Act by providing an overview of the resource management issues of the region and policies and methods to achieve integrated management of the natural and physical resource of the region.*

It is considered that resource management issues of regional significance arise with relation to the management of contaminated sites.

Section 30 of the RMA sets out functions of regional councils in giving effect to the RMA. Those functions relevant to contaminated sites management are set out below:

Section 30(1)(a) gives regional councils the function of establishing, implementing and reviewing the objectives, policies and methods to achieve integrated management of the natural and physical resources of the region.

Section 30(1)(b) gives regional councils the function of preparing objectives and policies in relation to any actual or potential effects of the use, development or protection of land which are of regional significance.

Section 30(1)(c) gives regional councils the function of controlling the use of land for the purpose of soil conservation, maintenance and enhancement of water quality and quantity in water bodies and coastal water, maintenance and enhancement of ecosystems in water bodies and coastal water and the prevention or mitigation of adverse effects of the storage, use transportation or disposal of hazardous substances.

Section 30(1)(ca) of the RMA gives regional councils the function of investigating land for the purposes of identifying and monitoring contaminated land.

Section 31 of the RMA sets out the functions of territorial authorities (TAs) in giving effect to the RMA. Those functions relevant to contaminated sites management are set out below:

Section 31(1)(a) gives TAs the function of establishing, implementing and reviewing objectives, policies and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district.

Section 31(1)(b)(ii) gives TAs the function of controlling any actual or potential effects of the use, development, or protection of land for the purpose of the prevention or mitigation of any adverse effects of the storage, use disposal or transportation of hazardous substances.

Section 31(1)(b)(iia) gives TAs the function of controlling any actual or potential effects of the use, development, or protection of land for the purpose of the prevention or mitigation of any adverse effects of the development, subdivision or use of contaminated land.

**APPENDIX 2 – Review of resource management issues**

Issue	Relevance	Significance	Recommendation
<p><u>Chpt 7, Issue 3</u></p> <p><i>Land use activities which result in soil contamination and consequent adverse environmental effects.</i></p>	<p>Remains relevant but may need to be updated to reflect new functions as delineated by Section 30(1)(ca) of the RMA as well as the full range of resource management issues including:</p> <p>Some Information regarding past land use is held by TAs, this information needs to be provided to ECan so that ECan's functions under the RMA can be fulfilled, and as such resourcing is required for this information provision</p> <p>Potentially contaminated land is identified in desktop studies of past land use using the Ministry for the Environment (MfE) Hazardous Activities and Industries List (HAIL). Such studies do not confirm contamination or levels of contamination. Making information regarding <i>potentially</i> contaminated sites available is controversial as land values can be affected.</p> <p><b>Some</b> contaminated sites <b>have</b> no party who is clearly responsible for the cleanup of the contamination. In some cases, such as sheep dip sites, land has become contaminated by <b>activities</b> required by government legislation. Resourcing the identification and clean up of such sites is a regional issue.</p> <p><b>On-site</b> testing of potentially contaminated sites needs to be undertaken in order to determine if the site is contaminated and if so what the associated risks of that contamination are. This requires resourcing. Sites need to be investigated before a change of use occurs. TAs or ECan <b>can only demand the investigation when the change of use triggers the need for resource consent.</b></p>	<p>Remains significant.</p>	<p>Retain this issue but update to reflect full range of issues and RMA provisions</p>

**APPENDIX 3 - Analysis of policy approaches: waste**

Option 1: Policy 7 is retained but the word *significant* is removed from the policy

	<b>For</b>	<b>Against</b>
<b>Purpose of the RMA</b>	<ul style="list-style-type: none"> <li>• Gives effect to the purpose of the Act</li> </ul>	
<b>Issue resolution</b>	<ul style="list-style-type: none"> <li>• Assists in resolving the issue and removing the word <i>significant</i> removes a need to qualify adverse effects within the policy framework.</li> </ul>	<ul style="list-style-type: none"> <li>• Is reliant on appropriate rules being in place at Regional Plan level</li> </ul>
<b>Integrated management</b>	<ul style="list-style-type: none"> <li>• Should ensure provisions are integrated at all levels of policy documentation</li> </ul>	
<b>Carrying out functions</b>	<ul style="list-style-type: none"> <li>• Achieves Environment Canterbury's functions and assists TAs in achieving their functions</li> </ul>	
<b>Consultation views</b>		
<b>OVERVIEW</b>	This approach is effective and should be retained.	

Option 2: A new policy is added that deals with the gradual build up of contaminants on a site

	<b>For</b>	<b>Against</b>
<b>Purpose of the RMA</b>	<ul style="list-style-type: none"> <li>• Gives effect to the purpose of the Act</li> </ul>	
<b>Issue resolution</b>	<ul style="list-style-type: none"> <li>• Assists in resolving the issue</li> </ul>	<ul style="list-style-type: none"> <li>• Adds specific problems to the issue where other specific problems (such as chemical spills) are not directly addressed.</li> </ul>
<b>Integrated management</b>	<ul style="list-style-type: none"> <li>• Ensures appropriate attention is given to the gradual build up of contaminants in soil</li> </ul>	
<b>Carrying out functions</b>	<ul style="list-style-type: none"> <li>• Achieves Environment Canterbury's functions and assists TAs in achieving their functions</li> </ul>	
<b>Consultation views</b>		
<b>OVERVIEW</b>	This approach would ensure appropriate attention is given to the gradual build up of contaminants in soil	

Option 3: Retain Policy 8 with minor alterations to reflect the new RMA provisions

	<b>For</b>	<b>Against</b>
<b>Purpose of the RMA</b>	<ul style="list-style-type: none"> <li>Gives effect to the purpose of the Act</li> </ul>	
<b>Issue resolution</b>	<ul style="list-style-type: none"> <li>Assists in resolving the issue</li> </ul>	<ul style="list-style-type: none"> <li>There are gaps in the effectiveness of the current policy that would not be resolved if this approach was taken</li> </ul>
<b>Integrated management</b>		<ul style="list-style-type: none"> <li>The current policy is not implemented as written and is contrary to the practical application. Retaining this framework will not assist in the integration of contaminated site management</li> </ul>
<b>Carrying out functions</b>	<ul style="list-style-type: none"> <li>Achieves Environment Canterbury's functions and assists TAs in achieving their functions</li> </ul>	
<b>Consultation views</b>		
<b>OVERVIEW</b>	This approach is ineffective and should not be pursued.	

Option 4: A new policy is included that provides for information sharing for the purpose of historic land use identification, between TAs and ECan.

	<b>For</b>	<b>Against</b>
<b>Purpose of the RMA</b>	<ul style="list-style-type: none"> <li>Gives effect to the purpose of the Act</li> </ul>	
<b>Issue resolution</b>	<ul style="list-style-type: none"> <li>Assists in resolving the issue as will ensure potential contaminated sites are identified in an efficient manner.</li> </ul>	
<b>Integrated management</b>	<ul style="list-style-type: none"> <li>Will provide for integration in that TAs will work with ECan to ensure all relevant information is available.</li> </ul>	<ul style="list-style-type: none"> <li>Relies upon buy in from TAs</li> </ul>
<b>Carrying out functions</b>	<ul style="list-style-type: none"> <li>Achieves Environment Canterbury's functions and assists TAs in achieving their functions</li> </ul>	
<b>Consultation views</b>		
<b>OVERVIEW</b>	This approach will ensure relevant information is available to ECan so that its functions under the RMA can be carried out in an efficient manner.	

Option 5: Change the wording of Policy 8 to reflect current practice in terms of management of sites identified as contaminated

	<b>For</b>	<b>Against</b>
<b>Purpose of the RMA</b>	<ul style="list-style-type: none"> <li>• Gives effect to the purpose of the Act</li> </ul>	
<b>Issue resolution</b>	<ul style="list-style-type: none"> <li>• Assists in resolving the issue as adverse effects will be mitigated as they are identified.</li> </ul>	
<b>Integrated management</b>	<ul style="list-style-type: none"> <li>• Will ensure integration between policy and practice</li> </ul>	<ul style="list-style-type: none"> <li>• Relies on RMA provisions to require resource consent. Integration into regional rules may be required</li> </ul>
<b>Carrying out functions</b>	<ul style="list-style-type: none"> <li>• Achieves Environment Canterbury's functions and assists TAs in achieving their functions</li> </ul>	
<b>Consultation views</b>		
<b>OVERVIEW</b>	This approach is efficient as it will not require any change in current practice. It is considered that current practice is effective.	

## Option 6: Ensure Policy 8 reflects ECan's functions under the RMA

	<b>For</b>	<b>Against</b>
<b>Purpose of the RMA</b>	<ul style="list-style-type: none"> <li>• Gives effect to the purpose of the Act</li> </ul>	
<b>Issue resolution</b>	<ul style="list-style-type: none"> <li>• Assists in resolving the issue and in meeting ECan's functions under the Act</li> </ul>	<ul style="list-style-type: none"> <li>• The issue may need to be updated to reflect the provisions of the Act</li> </ul>
<b>Integrated management</b>	<ul style="list-style-type: none"> <li>• Will ensure integration between the RMA and ECan policy</li> </ul>	
<b>Carrying out functions</b>	<ul style="list-style-type: none"> <li>• Achieves Environment Canterbury's functions and assists TAs in achieving their functions</li> </ul>	
<b>Consultation views</b>		
<b>OVERVIEW</b>	This approach will ensure ECan's functions under the Act are reflected in policy.	

Option 7: Include a new suite of policies aimed at resolving the issue as revised

	<b>For</b>	<b>Against</b>
<b>Purpose of the RMA</b>	<ul style="list-style-type: none"> <li>• Gives effect to the purpose of the Act</li> </ul>	
<b>Issue resolution</b>	<ul style="list-style-type: none"> <li>• Assists in resolving the issue as revised</li> </ul>	<ul style="list-style-type: none"> <li>• The issue needs to be updated</li> </ul>
<b>Integrated management</b>	<ul style="list-style-type: none"> <li>• Will ensure integration between policy and current practice</li> </ul>	
<b>Carrying out functions</b>	<ul style="list-style-type: none"> <li>• Achieves Environment Canterbury's functions and assists TAs in achieving their functions</li> </ul>	
<b>Consultation views</b>		
<b>OVERVIEW</b>	This approach will ensure all issues are resolved in the policy framework, however it has not been determined if policies are necessary to resolve the issues.	