



Contaminated Sites Remediation Fund – Round 2 2018/2019 Funding Recommendations

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	Action sought:	Response by:
To Hon David Parker, Minister for the Environment	Decision	15 March 2019

Actions for Minister's Office Staff	Return the signed report to MfE.
Number of appendices and attachments 4	Titles of appendices and attachments: 1. Applications Recommended for Funding 2. Applications Not Recommended for Funding 3. CSRF Priority List Revisions 4. Contaminated Sites Remediation Fund Eligibility and Assessment Criteria
Note any feedback on the quality of the report	

Ministry for the Environment contacts

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Contaminated Sites Remediation Fund – Round 2 2018/2019 Funding Recommendations

Key Messages

1. This briefing seeks your decision on applications to the contestable Round 2 – 2018/19 (Round 2) of the Contaminated Sites Remediation Fund (CSRF, the Fund). It also seeks your approval to publish the updated CSRF Priority List (the Priority List) on the Ministry for the Environment's (the Ministry) website.

CSRF Round 2 – 2018/19

2. The CSRF has an annual appropriation of \$2.628M. Following your decision on applications to Round 1 – 2018/19 of the CSRF (see briefing 2018-B-04554), \$0.262M was allocated towards two projects. Due to an expense transfer from CSRF appropriation from out-years to fund high value projects in the 2018/19 financial year, there is currently \$2.550M available for Round 2 projects.
3. The Ministry received five applications to Round 2, including one request for additional funding towards an existing project, the Kopeopeo Canal Remediation Project. More detail on the recommended projects and the projects not recommended for funding is provided, for your consideration and final decision, in Appendices 1 & 2 respectively. If you wish to provide comments on the recommendations, please do so using the 'Minister Comment' column in Appendices 1 & 2. An overview of the applications is as follows:

Table 1: Overview of Applications Received

Project Name	Applicant	Project Phase	Total Project Cost	CSRF Funding Requested	Priority List Site
Kopeopeo Canal Remediation Project	Bay of Plenty Regional Council	4 – Remediation	\$3,930,000	\$1,965,000	Y
Historic Christchurch Landfill Remediation	Canterbury Regional Council	4 – Remediation	\$1,653,000	\$1,637,000	Y
Hector Refuse Dump Site Remediation	West Coast Regional Council	4 – Remediation	\$661,816	\$661,617	Newly Identified Site
Investigation of Offsite Migration – Miramar Gasworks	Greater Wellington Regional Council	2 – Site Investigation	\$122,236	\$66,618	Y
Beach Road Landfills Remedial Planning	Otago Regional Council	3 – Remedial Planning	\$42,702	\$21,351	Newly Identified Site
Total			\$6,420,754	\$4,351,785	

Kopeopeo Canal Remediation Project is currently granted up to \$7,023,376 from the CSRF towards \$15,451,000 total project costs.

4. The CSRF assessment panel (the Panel) met and made a recommendation to fund three applications up to a maximum of \$2.550 million, utilising all of the available funding from the CSRF appropriation for this financial year. The Ministry endorses the Panel's recommendation.

The CSRF Priority List

5. The CSRF Priority List (the Priority List) is a list of probable and confirmed contaminated sites identified by regional councils as priorities for their region. The councils have provided information on these sites to the Ministry. Currently, the Priority List comprises 42 sites with the 10 highest ranked confirmed contaminated sites published on the Ministry's website.
6. A prioritisation tool (the Tool) is used to assess a range of human health and environmental scenarios to quantify risks and calculate a priority score for each site. The Tool is reliant on the quality of information provided by regional councils. The Tool does not aim to provide a comprehensive risk assessment; however, a precautionary principle is used.
7. The Priority List is revised as part of each funding round. Details for new sites identified by regional councils are provided to the Ministry (in the form of applications to the Fund); and, when sites that have been successfully managed or remediated, they are removed from the Priority List. It is not a comprehensive list of all the contaminated sites in New Zealand.
8. The public release of the CSRF Priority List is intended to place a greater focus on sites with significant contamination issues and encourage the responsible regional councils and landowners to address their respective priority sites through applying to the CSRF. The public release of the Priority List was notified to Cabinet in May 2014 [EG (14) 104].
9. Since the Priority List's inception, it has proven to be an effective way of incentivising regional councils to take action on their highest risk sites. Of the 59 sites that have been on the Priority List, 13 have been successfully remediated or managed and have since been removed from the Priority List as they are no longer considered high risk or priorities for their region.
10. Following any revisions, we provide you a revised Priority List for approval. As Minister for the Environment, you approve the Priority List for publication in conjunction with CSRF funding rounds. A copy of the published Priority List and an updated Priority List for your approval is attached in Appendix 3.

Next Steps

11. Following your decisions we will:
 - a. Advise successful and unsuccessful applicants on the outcomes of their applications;
 - b. Enter into negotiations with successful applicants to agree the final scope of their project and address any conditions of funding; and,
 - c. Publish the updated Priority List on the Ministry's website.
12. It is normal for the Minister to publicly announce successful applications once they have entered into a deed of funding. The Ministry will provide a draft media release for this purpose. However, if no Ministerial announcement is made within six months, applicants are free to announce the funding themselves.
13. Since its inception in 2003, councils have extensively used the CSRF to help with priority projects in their regions. The Priority List has significantly increased the pressure on the appropriation. For past three years, the CSRF was fully allocated and applications were turned down due to lack of funds. Increases in the cost of consultants, contractors, equipment and laboratory analysis are also limiting the ability of the CSRF to address priority sites.
14. Please note that it is uncertain when councils with Priority List sites will request funding and the requests may exceed the current CSRF appropriation. Councils may also be made aware of new high risk sites, which may require support through the CSRF. We will inform you when these requests are received and provide advice on options for supporting these projects.

Recommendations

15. We recommend that you:

- a. **Approve** all Panel recommendations presented in Appendices 1 and 2

Yes/No Yes No

Or

- b. **Agree** to record decisions individually in the 'Minister Decision' approve/decline column in Appendix 1 and Appendix 2

Yes/No Yes No

And / Or

- c. **Agree** to meet with officials to discuss the contents of this briefing

Yes/No Yes No

- d. **Agree** to publish on the Ministry's website, the updated CSRF Priority List presented in Appendix 3

Yes/No Yes No

Signature



Glenn Wigley
Director
Natural and Built System



Hon David Parker
Minister for the Environment

3 / 3 / 18
Date

I would like to discuss the decision making criteria. ~~I am~~, in particular if the pollution was caused by a historic practice of a local authority, and if the ~~last~~ successor is in a well-off area, why does central government subsidise remediation?

(as opposed to a now defunct private company)

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Contaminated Sites Remediation Fund – Round 2 2018/2019 Funding Recommendations

Supporting material

Purpose

1. This briefing seeks your decision on applications to the contestable Round 2 – 2018/19 (Round 2) of the Contaminated Sites Remediation Fund (CSRF/the Fund). As Minister for the Environment, you approve applications to the CSRF.
2. It also seeks your approval to publish the updated CSRF Priority List (the Priority List) on the Ministry for the Environment's (the Ministry) website. As Minister for the Environment, you approve the Priority List for publication in conjunction with CSRF funding rounds.

Context

Contaminated Sites Remediation Fund

3. The CSRF is a contestable fund administered by the Ministry with an annual appropriation of \$2.628 million. It is intended to support regional councils, unitary authorities and territorial authorities to fulfil their obligations for contaminated land management under the Resource Management Act 1991. Regional councils and unitary authorities are able to submit applications for contaminated sites that they consider priorities for investigation or remediation. The eligibility criteria for the Fund (Appendix 4) is structured to enable this.

CSRF Establishment

4. The provision of central government grants to encourage the clean-up of contaminated sites was initiated in 1999 with the creation of a Non-Departmental Output Class *Clean-up of Orphan¹ Contaminated Sites* in Vote Environment [CAB 99 M 19/7A & B].
5. On 8 September 2003, Cabinet approved the Contaminated Sites Remediation Fund for a three year period from July 2003 to June 2006 to operate in two parts with up to \$1.78 million available per year. Up to \$0.89m per year was to be allocated on a contestable basis to regional councils. The balance of the fund (\$0.89 million) was allocated to the clean-up of major contaminated sites such as the former Fruitgrowers Chemical Company site at Manua, Nelson, and Tui Mine, Waikato.
6. At that time, the Minister for the Environment was invited to report back to Cabinet Policy Committee by 30 June 2006 on providing access to the Fund for private parties [CAB Min (09) 30/4A]. The 2006 Budget added an additional \$1.5 million per year for three years to the original \$1.78 million per year. In 2010/11, Cabinet approved the transfer of \$1 million from the Sustainable Management Fund appropriation to the CSRF [CAB Min (10) 35/5C]. In 2011/12, \$150,000 was given up from the CSRF appropriation for the Waipa River Clean-up fund from 2013/14 through to 2037/38 [see CAB Min (11) 37/25]. Currently all of the \$2.628 million CSRF appropriation continues to be available to regional councils.

CSRF Application Process

¹ The Fund was originally called the *Orphan Sites Remediation Fund*. This name is not appropriate since the definition of an "orphan site" rests on a legal liability regime, which does not currently exist.

7. Funding is directed towards detailed site investigations, remedial planning, and/or remediation. Typically, funding from the CSRF contributes up to 50% of the total project costs; however, in some cases, the Fund can contribute a higher or lower proportion of costs.
8. Funding rounds are bi-annual and have previously closed on the last working day of March and September. In addition to the bi-annual funding rounds, the Ministry will consider applications for emergency/priority funding outside of the normal funding rounds. This is subject to funds being available and specific conditions being met.

CSRF Project Process

9. Projects that are approved by you, as Minister for the Environment, are invited to Stage II, Project Planning. This stage includes developing a Work Programme, conditions of funding and negotiating a deed of funding. Once the deed of funding is signed by both the Ministry and the funding recipient, the project may begin. The CSRF is not liable for any project costs incurred prior to the deed being signed.
10. Projects are typically run by regional councils and unitary authorities partnering with landowners and territorial authorities. A suitably qualified environmental practitioner with experience in contaminated land assessments and/or remediation projects is contracted to undertake the works on behalf of councils. The council then reports to the Ministry on the findings or progress of remediation.
11. Site works and any reports must be in line with requirements under the Resource Management (National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2012 and the Contaminated Land Management Guidelines Nos. 1² and 5³.

Assessment of Applications – Round 2 – 2018/2019

12. The Panel, comprising of two Ministry staff, an environmental consultant and a regional council representative, is convened to assess all applications against the fund's eligibility and assessment criteria. The Panel's members were selected based on their technical knowledge and experience in the contaminated land industry. The Panel included:
 - Phillipa Guthrey (non-voting Chair) – Manager, Ministry for the Environment;
 - Bruce Croucher – Senior Analyst, Ministry for the Environment;
 - Andrew Crosland – Project Manager, Ministry for the Environment;
 - Terre Nicholson – Principal Consultant, HD Geo Ltd; and,
 - Michelle Begbie – Scientist, Waikato Regional Council.
13. We received four applications for new projects/phases and one request for additional funding for an existing project phase. Of the five sites seeking funding towards projects, two have previously received funding from the CSRF, Historic Christchurch Landfill (Environment Canterbury) and Kopeopeo Canal Remediation Project (Bay of Plenty Regional Council). Detailed descriptions of projects including panel comments and project funding recommendations are provided in Appendices 1 and 2 for your consideration.

Additional information regarding applications

² Ministry for the Environment, 2001: Contaminated land management guidelines No. 1: Reporting on contaminated sites in New Zealand (revised 2011).

³ Ministry for the Environment, 2004: Contaminated Land Management Guidelines No 5: Site Investigation and Analysis of Soils (revised 2011).

Historic Christchurch Landfill

14. The purpose of this project is to remediate soil contamination discovered following the 2010/2011 earthquakes when fill material was found during earthquake repair works for a number of residential properties in a Christchurch suburb. The area was not identified on Environment Canterbury's (ECan) Listed Land Use Register (LLUR) records prior to receiving earthquake repair reports and therefore the LLUR details would not have been on any LIMs provided to residents by the Christchurch City Council when residents purchased their properties.
15. The land appears to have been filled around the early 1900s as the filling pre-dates houses that were built in the area in the 1940s. Key contaminants of concern are heavy metals and polycyclic aromatic hydrocarbons; lead, arsenic, chromium, copper and zinc are also present above expected background concentrations in surface soils and to depths up to at least 1.5 metres below ground level. Lead contamination is the greatest concern, with concentrations at the site exceeding the residential soil contaminant standard of 210 parts per million by 28 times.
16. In June 2018, with assistance from the CSRF (\$70,000), ECan completed the Phase 2 – detailed site investigation. The investigation determined that 23 properties are affected by contamination. Of these properties, 21 landowners are considered as 'innocent' landowners as they purchased their properties prior to the discovery of the contamination. Two of the landowners ^{s 9(2)(a)} purchased their properties after the contamination was known to Christchurch City Council, and details of the contamination would have been provided in a LIM as the properties had been added to the LLUR.
17. The Ministry received three separate applications from ECan, one for 12 'innocent' landowners, and one for each of the landowners who knew about the contamination at the time they purchased their properties. The remaining properties, whilst slightly contaminated, are not considered to require remediation. Exposure to the contamination present will be managed to acceptable levels using long-term site management plans. For ease of assessment, the Ministry has grouped all three applications into one.

Kopeopeo Canal Remediation Project

18. The Kopeopeo Canal extends from the Rangitāiki Plains west of Whakatāne in the Bay of Plenty. It runs east where it reaches the Orini Stream and then discharges into the Whakatāne River. It was built in the 1920s to convey drainage and floodwaters from low-lying farmlands in the Rangitāiki Plains into the Whakatāne Estuary.
19. The canal was contaminated between the 1950s and 1980s as a result of pentachlorophenol (PCP) contaminated stormwater discharges from a former sawmill which treated timber. PCP imported into New Zealand for use in the timber processing industry contained a percentage of impurities including dioxins. The stormwater contaminated the canal sediment as dioxins bind strongly to sediments. Studies carried out in 2005 revealed that dioxin levels in the sediments and eels residing in the canal were elevated and posed risks to human health under certain exposure pathways.
20. Bay of Plenty Regional Council (BOPRC) was granted funding from the CSRF for three projects between 2005 and 2007 to investigate and delineate the nature and extent of contaminants within the canal's sediments and to explore remedial options for the canal. The total funding received from the CSRF for the three projects was \$154,505.
21. The current remediation project, the 'Kopeopeo Canal Remediation Project' (the project) was originally approved funding up to \$1,502,500 to be applied towards \$3,005,000 total project costs from the 2011/12 financial year for a two-part project, Phase 3 – Remedial

Planning and Phase 4 – Remediation. The project commenced on 2 February 2012 and was due to be completed in September 2013.

22. The resource consent for the remedial works was granted in 2013, however, an appeal was filed with the Environment Court resulting in the process for the remediation portion of the project becoming more complex and controversial than originally anticipated. As such, the requirements in preparation for the resource consent hearing resulted in increased project costs and delays to starting physical works on site.
23. The project faced further delays and increased costs to address the resource consent conditions imposed by the hearing commissioners to ensure the project would be appropriately and actively monitored to mitigate some of the community's concerns. The outcome of the hearing meant that the remediation methodology had to be completely revised, it also placed a requirement for both independent and cultural monitors and additional extensive scientific monitoring of soil and groundwater. The consented remediation methodology comprises dredging the canal bed and encapsulating the contaminated material within secure containment sites where a subsequent bioremediation process, not part of the current project, will be carried out.
24. BOPRC has reapplied to the CSRF on three occasions since the original application in 2011 to address increased costs. Following the approval of all funding increases, the Deed of Funding was varied to reflect the changes to the project methodology and costs.
25. Currently, BOPRC is approved for up to \$7,023,376 from the CSRF towards \$15,451,000 total project costs. The changes to the remediation methodology and other imposed conditions resulted in project costs more than tripling and the completion date being extended from September 2013 to June 2018.
26. The project faced additional delays following the Edgecumbe Flooding in April 2017 as contractors working on the Project were called away to assist with the emergency flood response. This necessitated a further variation to the Deed of Funding to extend the completion date to 30 June 2019; there were no changes to the project costs at this time.
27. Physical works to construct the containment cells began in late 2017 and dredging commenced on 22 January 2018.
28. BOPRC has now requested additional funding of \$1,965,000, which is required for the project to be completed successfully. This request is 50% of the total costs required to complete the project (\$3,930,000). The cost increases are primarily due to the following:
 - a. Weather Delays;
 - b. Dredging rates being slower and more costly than anticipated; and,
 - c. Containment site changes.
29. Discussions between the Principal Contractor and BOPRC at the Chief Executive level have continued following the submission of the application on 28 September 2018. The two parties are working towards an agreed cost to finish the project in a timely manner and are likely to come to an agreement outside of arbitration.

Miramar Gasworks

30. The Wellington Gas Company operated a coal gas plant on the site in Miramar between 1915 and 1972. Following demolition of the plant in 1972, the site was subdivided for industrial development and properties were sold to private purchasers.
31. The former gasworks site is contaminated by a variety of organic compounds including polyaromatic hydrocarbons and benzene that are typical of gasworks waste. There is also some risk to the environment resulting from contaminated groundwater entering the storm water system and discharging into the Wellington Harbour.

32. Greater Wellington Regional Council has recently completed a gas survey of the site to determine whether vapours posed any immediate health risks to neighbouring sites. Fortunately, significant concentration of harmful vapours were not detected during the exercise.

Coastal Dump Sites

33. Otago and West Coast Regional Councils have applied for funding to address two previously unknown dumpsites in Oamaru, Otago and Hector, West Coast. These dumpsites have been exposed and deposited contaminated materials on the foreshore following storm events in recent years.

Contaminated Sites Remediation Fund Priority List Updates

Contaminated Sites Remediation Fund Priority List Overview

34. Established in 2014, the Priority List is an initiative to identify and rank sites for investigation and clean up based on their risk to human health and the environment, to ensure that requests for government funding are assessed and prioritised in a robust and transparent way.
35. The Priority List is compiled from a list of contaminated sites provided by regional councils. Prioritisation relies on the quality of information provided by regional councils. The Priority List is not a comprehensive list of all the contaminated sites in New Zealand.
36. New sites are added to the Priority List when applications to the CSRF are made, the site which is applied for (if not already on the Priority List) is assessed by the Ministry using a prioritisation tool. Additionally, regional councils can provide information to the Ministry on sites as they are discovered. As such, the Priority List is updated regularly and the sites ranking can change frequently due to any new information provided on the site.
37. The top ten confirmed contaminated sites pose the greatest risk, are published on the Ministry's website and are prioritised for government funding. Eight of the ten sites on the current list have received or are receiving assistance from the CSRF.
38. When sites are remediated or are no longer considered a priority for funding (following further investigation) they will be removed from the Priority List and replaced with new sites. Other highly contaminated sites may exist but are not currently a regional council priority and/or are ineligible for CSRF funding.
39. Whilst the CSRF is directed towards sites with contamination, there is no funding from the CSRF currently being used towards the issues arising from the use of per- and poly-fluoroalkyl substances (PFAS) on New Zealand Defence sites as they would likely be ineligible for funding.

Analysis and Advice

Funding recommendations for applications to the CSRF

40. The Panel assessed the five applications received through the contestable funding round and recommended three applications for funding with conditions. The applications recommended for funding have clearly demonstrated each project's benefits and how they will improve environmental and human health outcomes. The intent of the conditions of funding recommended is to reduce potential risks to the Ministry. We will address the details of these conditions during the project planning stage of the work prior to signing a deed of funding.

41. We endorse the Panel's recommendation to fund these applications. We consider the Panel undertook a robust assessment of the applications against the Fund's assessment criteria (Appendix 4). Table 2 below lists the applications recommended for funding, including a comment on the amount of funding recommended and any conditions of funding set by the Panel.
42. Approval of the three projects recommended for funding will require \$2.550 million from the Fund towards total project costs of \$5.705 million.
43. An overview of the conditions of funding recommended by the Panel is provided below. For your consideration, appendix 1 provides a summary of the Panel's minutes from the Panel's moderation meeting, the final funding decision, as well as the details of funding conditions set by the Panel.

Table 2: Overview of Applications Received

Project Name	Applicant	Project Phase	Total Project Cost	CSR Funding Requested	Comments
Kopeopeo Canal Remediation Project	Bay of Plenty Regional Council	4 – Remediation	\$3,930,000	\$1,965,000	Recommended reduced funding with conditions
Historic Christchurch Landfill Remediation	Canterbury Regional Council	4 – Remediation	\$1,653,000	\$1,637,000	Recommended reduced funding with conditions.
Investigation of Offsite Migration – Miramar Gasworks	Greater Wellington Regional Council	2 – Site Investigation	\$122,236	\$66,618	Recommended funding as requested with conditions.
Hector Refuse Dump Site Remediation	West Coast Regional Council	4 – Remediation	\$661,816	\$661,617	Not recommended for funding
Beach Road Landfill Remedial Planning	Otago Regional Council	3 – Remedial Planning	\$42,702	\$21,351	Not recommended for funding
Total			\$6,420,754	\$4,351,785	

44. The number of uncontrolled dumpsites in coastal areas exposed by storm events and erosion is increasing, and we expect this number to increase due to climate change factors such as increased sea level rise and storm intensity. Currently six sites are known to the Ministry.
45. The number of coastal dumpsites at risk is unknown and further funding of the coastal dumpsites is not recommended until there is a better understanding of the significance and scale of this issue. The CSR team are engaging with the Regional Council's waste and contaminated land special interest group and the Ministry's climate change teams to scope out potential options for addressing this issue.

Pressure on the funding appropriation

46. The Fund was established as a trial from 2003 to 2006 to test a funding model for assisting regional councils to address high-risk contaminated sites. Following the review of the Fund

in 2006, which demonstrated the success of the Fund, Cabinet increased the annual appropriation to \$2.78 million. Although special appropriations have been approved through Vote Environment where large scale, high risk sites have required additional funds (Tui Mine, Fruitgrowers Chemical Company, Patea Freezing Works), the Fund's appropriation has not changed significantly since the 2006 review.

47. Since 2003, the quality of investigation/remediation methodologies, analytical testing and the range of contaminants addressed has improved. However, these improvements, along with increased consultant/contractor rates have significantly increased the costs for investigation and remediation projects. The Fund has been fully or over allocated for a number of years due to increased costs for large remediation projects. The Fund has only been able to support a number of significant clean-up projects (Calwell Slueway Remediation Project & Kopeopeo Canal Remediation Project) by pulling forward funding from out-years. However this approach is not sustainable as it only reduces the ability of the Fund to support projects in futures years.
48. The most common remedial practice is the 'dig and dump' method, where contaminated material is removed from site and deposited in a landfill. A review of the Waste Minimisation Act 2008 is underway and if the waste disposal levy is expanded and increased, this will significantly increase the costs to remediate the majority of contaminated sites. The Fund supports sustainable remediation methodologies, however these are often more costly, use technology that is not readily available in New Zealand and have ongoing monitoring and management costs.
49. Land contamination generally occurs as a result of poor or inappropriate management of hazardous chemicals or wastes. The review of the Waste Minimisation Act may provide an opportunity to investigate how an expanded and/or increased waste disposal levy may be able to support the investigation and remediation of contaminated land and/or the Fund.

Updates to the CSRF Priority List following Round 2 – 2018/19

50. Two new sites (Hector Refuse Dump Site & Beach Road Landfill) from Round 2 have been added to the Priority List. These sites are below the top ten and are therefore not included in the Revised Priority List for publication. Two sites, Kaka Point Closed Landfill (Otago) and Cambridge Gaslights Theatre (Waikato) were removed from the Priority List as the councils have taken action to manage or remediate the sites and they are no longer considered a priority for the councils. Both sites were also outside of the published Priority List. The complete Revised CSRF Priority List is attached as Appendix 3.
51. In our last briefing to you (18-B-04554), we recommended not including the top ranked site on the Priority List, s 9(2)(a) in Canterbury, due to the nature of the site which includes approximately 20 private landowners. It was deemed that the risk of undue attention to the residents living on the site may be of greater impact than the contamination itself. However the total funding requested exceeds the funding available and applications are being declined which may lead to questions on the Fund's expenditure. Therefore the Ministry now sees benefit in including this site on the published Priority List but recommends using a more discrete name, 'Historic Christchurch Landfill', which does not identify to the site's location in Canterbury in order to protect the landowners.
52. As this site is number one on the Priority List and there are limited funds available for this round, the Ministry advises including this site in the revisions to show other applicants it is the number one ranked site and thus prioritised for funding this round.
53. If the Historic Christchurch Landfill is published as the number one ranked site on the Priority List, the other sites on the list will shift down one place from the last update earlier this year. There is one other site, Rotowaro Carbonisation Plant, that was previously ranked 7th which has been removed, This site was investigated and the discharge of

contaminants to the surrounding environment was very low. Although there are contaminants on site, given the site's remote location, in its current state this site poses a low risk to health and the environment.

Risks and mitigations

54. The Panel has conducted a rigorous assessment of all applications against the Fund's criteria. If a project is funded outside of the recommendations made by the Panel (for example, without the conditions of funding) there is an increased risk that the project will either not support the intended outcomes of the CSRF or not meet its stated objectives.
55. If a project is not approved for funding, if the council wishes to proceed with the project there is an increased risk that they will not have sufficient funds available to commit to the site and any increased costs may fall on the local ratepayers.
56. The Ministry is proposing to now include the Historic Christchurch Landfill site in Canterbury on the Revised Priority List given the level of funding requested from this funding round. The intent of this decision is to maintain transparency with stakeholders as some applications are being declined and others are receiving less funding than applied for. Showing that the number one site on the Priority List has been prioritised for funding ensures consistency with the intent of the CSRF Priority List.
57. There is a risk that the 100% funding granted for the Historic Christchurch Landfill may set a precedent for other sites of this nature. The risk is minimised however, as only the landowners who unknowingly purchased the land prior to the discovery of the landfill will receive 100% funding. The value of these properties will not increase significantly following remediation as they were purchased at the full market rate. The two landowners who knew their properties were contaminated (and may have purchased at a discounted rate) will only be granted 50% funding for remediation as per usual CSRF processes. The proposed level of funding will ensure that these sites are remediated. A lower percentage of funding may result in some landowners not remediating their sites due to financial constraints.
58. There is a risk that the CSRF appropriation is no longer sufficient to fund remediation projects. The costs for site works and investigations has increased significantly since the Fund's appropriation was last reviewed in 2006. The Ministry will investigate the Fund's potential future funding requirements and opportunities to increase the appropriation or to look for other sources of funding, such as through an amendment to the Waste Minimisation Act.

Legal issues

59. We have not identified any legal issues with this briefing.

Financial, regulatory and legislative implications

2018/19 Funding Profile

60. There is currently \$2.550M remaining available for the 2018/2019 financial year, as you allocated \$0.262M to two projects from Round 1 – 2018/19 (see 2018-B-04554). These projects are currently finalising Deeds of Funding with the Ministry and will commence works in early 2019.
61. The full appropriation of \$2.628M was not available for the 2018/19 financial year as \$0.511M was transferred from both the 2018/2019 and the 2019/20 financial years into the

2017/18 financial year to fund high value projects⁴ that were granted funding in the 2017/18 funding round.

62. In addition to funding being transferred out of the 2018/19 financial year, a \$2M expense transfer from 2017/18 to 2018/19 was made for the Kopeopeo Canal Remediation Project. Table 3 below shows the current funding profile, including accruals and contracts payable.

Table 3: Current funding profile for the Contaminated Sites Remediation Fund

	2018/19 \$'000
CSRF Appropriation	2,117
Expense and In-principle expense transfers from 2017/18	2,375
2018/19 Opening accruals	3,097
Total Funds Available	7,589
Less: Funding payable (deeds with end date as 30/06/2019)	(5,277)
Less: Funds allocated to Round 1 – 2018/19 Projects	(0,262)
Balance	2,550

63. If you approve the three projects recommended for funding, this will required the full balance of the 2018/19 financial year.

Future Funding Profile

64. Table 4 below confirms the future funding profile for the Fund from 2019/20 to 2021/22 (the current forecast period). As noted above, an expense transfer of \$0.511M from 2019/20 to 2017/18 was made to account for high value projects that had commenced site works, such as the Kopeopeo Canal Remediation Project, Calwell Slipway Remediation Project, and the Concoors Electroplaters Site.

Table 4: Future funding profile for the Contaminated Sites Remediation Fund

	2019/20 \$'000	2020/21 \$'000	2021/22 \$'000
CSRF Appropriation	\$2,628	\$2,628	\$2,628
Less: funds moved forward to 2017/18	(0,511)	-	-
Total Funds Available	2,117	2,628	2,628

65. Despite the high level of funding requested from this funding round, the Panel recommended to only use the funding available and not to expense transfer any more funding from out years. Transferring funding from future years can be difficult to manage, and means that the Fund is less able to support future projects if there are insufficient funds available.

⁴ The high profile sites comprise Kopeopeo Canal Remediation Project, Calwell Slipway Remediation Project, and the Concoors Electroplaters Site.

⁵ Funding transferred for the Concoors Electroplaters Site relates to the Phase 2 project, which is complete. Environment Canterbury was granted funding from the Round 1 2018/19 funding round to a new, Phase 3 project.

Next Steps

66. Following your decision, we will advise successful and unsuccessful applicants of the outcome of their application, confirm their intent to proceed, and will publish the updated CSRF Priority List on the Ministry's website.

Proactively released under the Official Information Act 1982

Appendices

1. Applications Recommended for Funding
2. Applications Not Recommended for Funding
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Appendix 1. Applications recommended by the Panel

Applicant	Location	Project outline and Panel comments (project title, brief project description, summary of panel comments)	Total Project Cost	CSRF \$ applied for	Panel recommendation (endorsed by the Ministry)	Minister Comment (✓ one option for each application)
Canterbury Regional Council (Environment Canterbury)	Christchurch	<p><u>Historic Christchurch Landfill Clean-up (No. 1 CSRF Priority List)</u></p> <p>The purpose of this project is to remediate soil contamination discovered following the 2010/2011 earthquakes when fill material was found during earthquake repair works for a number of residential properties in a Christchurch suburb.</p> <p>Panel comments:</p> <ul style="list-style-type: none"> The Panel noted that the applicant requested 100% funding which is not typical of CSRF projects. Agreed that this situation is unique with innocent landowners. Concern was noted that funding may improve the value of homes to residents and may not be an appropriate use of government funding; however, the Panel was supportive that the proposed approach was not to maximise profits to land owners but to return land to its original purpose. The project intends to protect human health by making the land good for intended use. Residents will still be required to maintain the cap and cover which may have on going costs. If full funding is not granted, obtaining funding from other sources (from Christchurch City Council or Environment Canterbury – through long term planning) may be timely and would result in exposing residents to contamination for longer periods. Site demonstrated the clearest exposure pathways to receptors. The Panel was supportive of the proposed approach to manage exposure and risks. <p>Risks and Mitigations:</p> <p>Properties bought after the contamination was identified may not be eligible for funding as their purchase prices may have reflected this contamination and allowed the landowners to undertake remediation at their cost or they may have not undertaken sufficient due diligence.</p>	\$1,653,000	\$637,000	<p>Application recommended for funding as presented conditional to:</p> <ul style="list-style-type: none"> 100% funding of costs submitted in the budget less \$24,000 costed towards ineligible items (NES Consent). To be directed towards the twelve properties included in the application for landowners who purchased homes before the discovery of contamination at the site. <p>Twelve pre-discovery properties: up to \$1,276,000</p> 50% funding of total project costs less \$4,000 costed towards ineligible items (NES Consent) to be directed towards the landowners who purchased homes after the discovery of contamination at the site <p>§ 9(2)(a) up to \$95,500</p> <p>§ 9(2)(a) up to \$79,000</p> <p>Total recommended funding for Environment Canterbury: \$1,450,500</p>	<p>Option 1: Approve - agree with the Panel's recommendation <input type="checkbox"/></p> <p><u>or</u></p> <p>Option 2: Decline the application <input type="checkbox"/></p> <p><u>or</u></p> <p>Option 3: Approve the amount requested by applicant* <input type="checkbox"/></p> <p><u>or</u></p> <p>Option 4: meet with officials to discuss funding options <input checked="" type="checkbox"/></p> <p><i>70% Govt / 30% Local Govt</i></p>
Bay of Plenty Regional Council	Whakatāne	<p><u>Koapepe Canal Remediation Project (No. 3 CSRF Priority List)</u></p> <p>This is an existing project currently granted up to \$7,023,376 from the CSRF towards \$15,451,000 total project costs with significant budget overruns. The purpose of the project is to remediate a 5 kilometre section of canal that is contaminated with dioxins.</p> <p>Panel comments:</p> <ul style="list-style-type: none"> Existing project with significant cost overruns due to multiple factors (weather delays, dredging material differences, slower pumping rates). The Panel felt the delays for flooding were justified. High sensitivity around the site and stakeholder relationship management. The project is at a tipping point, close to being finished and not funding the completion may cause the project to fall over. Principal Contractor not performing as they originally quoted in their contract and noted this should not be at BOPRC or the Government's expense. The dredging contractor is not meeting terms of their contract, however BOPRC are not privy to details of sub-contractor's contract. Panel stated the need for the project to be accountable and transparent The Panel raised concerns that contamination up-gradient may re-contaminate the site – The Ministry noted a separate project was being funded to assess up-gradient contamination. The Panel was supportive of the application and providing funding to allow the project to finish, but could not make an accurate assessment of project costs with the budget information that was supplied. The recommendation was made for the Ministry to request more detail on project costs to ensure expenditure is justified and reasonable 	\$3,930,000	\$1,965,000	<p>Application recommended for funding as presented conditional to:</p> <ul style="list-style-type: none"> Outstanding Milestone claim for completed works to be submitted for payment to assess project spending to date. Recommendation by the Engineer to Contract that additional costs to complete the project are justified and reasonable. Costs quoted to complete the project must be fixed and final, no provisional sums will be accepted. Additional funding will be accessible once an agreement has been made regarding costs to complete the project and a decision has been made regarding the two requests for variation from the principal contractor, Envirowaste. A copy of the contract showing the final approved costs to complete the project signed by Envirowaste and BOPRC must be provided; a detailed breakdown of cost must be included, outlining dredging rates, personnel hours, equipment overheads, etc. The contract must also outline key dates and targets for 	<p>Option 1: Approve - agree with the Panel's recommendation <input checked="" type="checkbox"/></p> <p><u>or</u></p> <p>Option 2: Decline the application <input type="checkbox"/></p> <p><u>or</u></p> <p>Option 3: Approve the amount requested by applicant* <input type="checkbox"/></p>

Applicant	Location	Project outline and Panel comments (<i>project title, brief project description, summary of panel comments</i>)	Total Project Cost	CSRF \$ applied for	Panel recommendation (endorsed by the Ministry)	Minister Comment (✓ one option for each application)
		<p>Risks and Mitigations:</p> <p>Due to the negotiations occurring between the regional council and the contractor at the time the application was submitted, some details in the budget and agreed cost to finish works was limited. It was felt that these details would be able to be addressed during the project planning stage of the work prior to signing a deed of funding with the Ministry.</p>			<p>stages of works to be completed including meeting quoted dredging rates. Payments will only be made if targets are made on time and within updated approved budget.</p> <p>- No payment claims from this increased funding amount will be paid until the approved CSRF funding of \$7,023,376 is claimed and paid out in full as per the terms of the Deed.</p> <p>Payment of \$1,034,882 will be made towards actual costs, upon completion of the Kopeopeo Canal Remediation Project and the final reports, including the validation report, is approved by the Ministry.</p> <p>Recommended funding for Bay of Plenty Regional Council: Up to \$1,034,882</p>	<p>Option 4: meet with officials to discuss funding options</p>
Greater Wellington Regional Council	Wellington	<p><u>Investigation of Offsite Migration – Miramar Gasworks (No. 7 CSRF Priority List)</u></p> <p>The former gasworks site is contaminated by a variety of organic compounds including polyaromatic hydrocarbons and benzene that are typical of gasworks waste which have been shown to be migrating offsite. There is also some risk to the environment resulting from contaminated groundwater entering the storm water system and discharging into the Wellington Harbour.</p> <p>A recently gas survey of the site to determine whether vapours posed any immediate health risks to neighbouring sites completed Greater Wellington Regional Council found no significant concentration of harmful vapours.</p> <p>Panel comments:</p> <ul style="list-style-type: none"> The scope of the project was unclear, as was what the council is trying to achieve. Design of the investigation seems to be to determine if regulatory tools could be used to manage any offsite discharge, which is considered unlikely. The site has been a CSRF Priority Site since 2014, although it appears following some previous investigations undertaken by the council indicate it may be a low risk site with respect to human health as no complete exposure pathways identified. The panel considered the investigation will give better understanding of the plume and will help determine if the plume is expanding under residential properties in the area or towards coastal environments. The investigation will complete the risk assessment and will allow council to make an informed decision, as to whether any further action is require at the site, or if the contamination can be managed through natural monitored attenuation process. <p>Risks and Mitigations:</p> <p>There are no significant risks identified with this project at this time</p>	\$122,236	\$66,618	<p>Application recommended for funding as presented conditional to:</p> <p>The project objectives must include an assessment of any change in the off-site contamination status and an assessment of risk to offsite receptors</p> <p>Recommended funding for Greater Wellington Regional Council: \$66,618</p>	<p>Option 1: Approve - agree with the Panel's recommendation <input checked="" type="checkbox"/></p> <p>or</p> <p>Option 2: Decline the application <input type="checkbox"/></p> <p>or</p> <p>Option 3: meet with officials to discuss funding options <input type="checkbox"/></p>
Total CSRF funding recommended by the Panel					Up to \$2,550,000	

* Selection of these options may require reducing and/or declining funding for other approved projects or require funding being pulled forward from out-years.

Appendix 2: Applications not recommended by the Panel

Applicant	Location	Project outline and Panel comments (project title, brief project description, summary of panel comments)	Total Project Cost	CSRF \$ applied for	Panel recommendation (endorsed by the Ministry)	Minister Comment
West Coast Regional Council	Hector	<p><u>Hector Refuse Dump Site Remediation (No. 22 CSRF Priority List)</u></p> <p>The purpose of this project is to construct a seawall to retain contamination landfill materials preventing them entering the marine environment.</p> <p>Panel comments:</p> <ul style="list-style-type: none"> The Panel thought the application has merit and good social benefits but, felt that given there were likely to be many, many more of these sites that there needed to be consideration of a national approach to coastal dump sites and climate change adaption before committing funding towards the project. The site did not rank as high as other applications to this round and as there is limited funding available, funding needs to be directed towards the highest risk sites. Panel noted that despite the waste being generated by a former Crown owned entity, the site was not on Crown land and therefore the site was still eligible for funding The cost of the site works is 30% of the rates revenue for a small council, Buller District Council. The Panel questioned whether or not the timeframe for protection was practical and reasonable with predicted sea level rise and increased storm intensity. Hector is a small community and the site is a disproportionately visible part of the waterfront. A question was raised whether the application was to fund the continuation/completion of an existing sea wall and whether the intent was to address a contaminated site or to protect the town from storm surge. The application did not provide an assessment of remedial options, it was not clear if a sea wall was the best option for remediation of the site. <p>Risks and Mitigations:</p> <p>Discovery of uncontrolled dumpsites in coastal areas following storm events is increasing. Once a nationally co-ordinated approach to historic refuse sites in eroding coastal areas is determined then the CSRF may be revisited.</p>	\$661,816	\$661,617	Not recommended for funding	<p>Option 1: Agree with the Panel and decline the application <input checked="" type="checkbox"/></p> <p><u>Or</u></p> <p>Option 2: Fund the application* <input type="checkbox"/></p>
Otago Regional Council	Oamaru	<p><u>Beach Road Landfills Remedial Planning (No. 11 CSRF Priority List)</u></p> <p>The project aims to assess the risks to human health and the environment from the presence of asbestos in an eroding historic landfill along the coastline at Ocean Beach, Bluff and to carry out a cultural impact assessment.</p> <p>Panel comments:</p> <ul style="list-style-type: none"> The Panel thought the application has merit and good social benefits but, felt that given there were likely to be many, many more of these sites that there needed to be consideration of a national approach to coastal dump sites and climate change adaption before committing funding towards the project. The site did not rank as high as other applications to this round and as there is limited funding available, funding needs to be directed towards the highest risk sites. The costs for the project appeared to be higher than average for a Remedial Action Plan report, it was unclear where additional costs were factored in. <p>Risks and Mitigations:</p> <p>Discovery of uncontrolled dumpsites in coastal areas following storm events is increasing. Once a nationally co-ordinated approach to historic refuse sites in eroding coastal areas is determined then the CSRF may be revisited.</p>	\$42,702	\$21,351	Not recommended for funding	<p>Option 1: Agree with the Panel and decline the application <input checked="" type="checkbox"/></p> <p><u>Or</u></p> <p>Option 2: Fund the application* <input type="checkbox"/></p>

* Selection of these options may require reducing and/or declining funding for other approved projects or require funding being pulled forward from out-years.

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Appendix 3. Contaminated Sites Remediation Fund - Revised Priority List

Updated CSRF Priority List – as at 21 May 2018						Updates on Site occurring 2017 – 2018	Change to site ranking from Round 1 – 2018/19
Rank	Site Name	Town/City	Regional Council	CSRF Funded Project	Description	<i>Note: the information provided in this column is not publically available</i>	<i>Note: this column not to be published</i>
1	Historic Christchurch Landfill*	s 9(2)(a) Christchurch	Environment Canterbury	<i>Past Project:</i> Phase 2 – Site Investigation (2017/18) Current Application: Phase 4 – Remediation	The site includes a number of residential properties in s 9(2)(a) Christchurch believed to be impacted by historical landfilling. A number of un-associated investigations have taken place on individual properties, mainly as a result of insurance works after the Canterbury Earthquakes in 2010/11 which identified fill material and exceedances of relevant human health guidelines. HAIL Category: G3	Remedial Action Plan commissioned by ECan was provided with the application for Phase – 4 works.	No change Site not included on previous website update
2	Concours Electroplaters	Timaru	Environment Canterbury	<i>Past Project:</i> Phase 2 – Site Investigation (2016/17) Current Project: Phase 3 – Remedial Planning (2018/19)	A former electroplating works was used to store large volumes of hazardous chemicals. A preliminary site investigation which took place in June 2016 indicated that the soil on the site may be contaminated from the electroplating works and hazardous waste stored on the site. The hazardous waste was removed from the site in late 2016 and a site investigation was undertaken in mid-2017 to determine the extent of contamination on the site. HAIL Category: D3	Project from Round 1 – 2018/19 to characterise the groundwater plume and prepare a Remedial Options Assessment/Remedial Action Plan is will commence in January 2019	Previously 1 st
3	Kopeopeo Canal**	Whakatāne	Bay of Plenty Regional Council	Current Project: Phase 4 – Remediation (2011/12) Phase 2*** – Site Investigation (2017/18 Kopeopeo Extension West site) Current Application: Phase 4 – Remediation – budget increase	The Kopeopeo Canal was constructed to carry surface run-off and flood waters from low lying farmland in the Rangitāiki plains into the Whakatāne Estuary. Between 1950 and 1989 the canal was contaminated by dioxin from surface run-off and storm water discharges from the NZ Forest Products Ltd Sawmill. Investigations in 2005 found that the levels of dioxins in the sediment and in eels were elevated. HAIL Category: H	Remediation underway – due to be completed late 2018	Previously 2 nd
4	Waikanae Stream	Gisborne	Gisborne District Council	Current Project: Phase 2 – Site Investigation (2016/17)	There are a number of industrial and landfill sites situated in the Waikanae Stream catchment. These sites are potentially discharging contaminants into the stream and negatively affecting human and environmental health	Detailed Site Investigation currently underway	Previously 3 rd
4	Ocean Beach Landfill	Bluff	Southland Regional Council	Current Project: Phase 2 – Site Investigation & Phase 3 – Remedial Planning (2018/19)	Ashes was discovered at the beach adjacent to the former Frozen Meat Company freezing works. Historically, the rear of the former freezing works has been used to carry out landfilling and rubbish dumping. The full extent of landfilling in the area is unknown. There has been no investigations carried out and very little is known about the date of landfilling activities or other contaminants buried on site. The site is popular tourist area as it provides access to the Foveaux Walkway near Bluff Hill.	Project from Round 1 – 2018/19 to conduct a Detailed Site Investigation and prepare a Remedial Options Assessment/Remedial Action Plan is will commence in January 2019	Previously 4 th
6	Onehunga Aquifer	Auckland	Auckland Council	Current Application: Phase 2 – Site Investigation	The former New Zealand Farmers Fertilizer Works operated from 1910 to 1984. Fertilizer products were manufactured, stored, and handled onsite. Contamination of the site, groundwater and surface water was caused by on-site storage of raw material and effluent. Off-site effluent discharges have also affected nearby waterways including the Miami Stream and Manukau Harbour HAIL Category: A6	No new information provided to MfE	Previously 5 th
7	Miramar Gas Works	Miramar	Greater Wellington Regional Council	Current Application: Phase 2 – Site Investigation	The Wellington Gas Company operated a coal gas plant on the site between 1915 and 1972. Following demolition of the plant in 1972, the site was subdivided for industrial development and properties were sold to private purchasers. The former gasworks site is contaminated by a variety of organic compounds including polyaromatic hydrocarbons and benzene that are typical of gasworks waste. There is also some risk to the environment as a result of contaminated groundwater entering the storm water system and discharging into the Wellington Harbour. HAIL Category: A7	Council funded investigation late 2017. Application to the CSRF has been discussed with Council	Previously 6 th

Updated CSRF Priority List – as at 21 May 2018					
Rank	Site Name	Town/City	Regional Council	CSRF Funded Project	Description
8	Te Mome Stream	Lower Hutt	Greater Wellington Regional Council	<i>Past Project:</i> <i>Phase 2 – Site Investigation (2006/07)</i>	A dead arm of the Hutt River, receives stormwater from the Hutt Valley, main contamination concern is from a lead battery recycling plant HAIL Category: B1
9	Control Mine Base	Auckland	Auckland Council	<i>Current Project:</i> <i>Phase 4 – Remediation (2017/18)</i>	During the Second World War defence forces constructed a base on Rangitoto to control the mines protecting Auckland harbour. The buildings remained on the site until the 1980s, when they were demolished. The demolition work left a large amount of asbestos containing material littered across the site. As the area is a popular tourism destination there is a risk that asbestos fibres from the material will pose a risk to visitors to the site. HAIL Category: E1
10	Premier Pine	Masterton	Greater Wellington Regional Council	N/A	Site was used for Chromated Copper Arsenate (CCA) timber treatment since the 1950s. HAIL Category: A18
Sites which have been removed from the Priority List					
-	Rotowaro Carbonisation Plant**	Huntly	Waikato Regional Council	<i>Past Project:</i> <i>Phase 2 – Site Investigation (2015/16)</i>	From the late 1930s until 1985, Waikato Carbonisation Limited made coke, coal tar and creosote from coal at its Rotowaro plant near Huntly. There were few controls on the use of dangerous substances and waste was discharged with little or no treatment. During the 1980s, efforts were made with no success to find other ways to dispose of the waste water. Industrial rubbish and derelict equipment, waste oils and tar littered the site. Run-off carried phenols, ammonia and hydrocarbons into the Awaroa stream. After a fire in 1985, the company went into voluntary liquidation. The site was abandoned which means it now presents risks to people's health and the environment. HAIL Category: A7

Updates on Site occurring 2017 – 2018	Change to site ranking from Round 1 – 2018/19
<i>Note: the information provided in this column is not publically available</i>	<i>Note: this column not to be published</i>
No new information provided to MfE	No change
Remediation project currently underway.	No change
No new information provided to MfE	No change
The site is being actively managed and monitored by council and is not currently a priority for more works. The site may be added to the Priority List again in the future if it is reprioritised by council as it still poses a risk to human health and the environment.	Previously 7 th

*Historic Christchurch Landfill site was previously referred to as S9(2)(a) the name has been changed to not elude to the location of the site.

**Note: Sites which have had multiple project phases funded spanning a number of funding rounds only have recently funded projects listed.

***Note: Kopeopeo Canal has two separate deeds of funding with the Ministry – Kopeopeo Canal Remediation Project and Kopeopeo Extension West.

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Appendix 4: Contaminated Sites Remediation Fund Eligibility and Assessment Criteria

Eligibility Criteria	
1	A project will only be considered for funding after a completed application form has been submitted to the Ministry.
2	The site must have been undertaking activities likely to result in site contamination at one of the following points in time: <ul style="list-style-type: none"> • before the Resource Management Act (RMA) was enacted in 1991 • after the RMA was enacted in 1991 but no enforcement could be undertaken by RCs, UAs or territorial authorities to investigate and/or remediate the contamination, and the activities that caused the contamination have since stopped.
3	The application must be for one or more of the following phases of remediation: <ul style="list-style-type: none"> • two – detailed site investigation • three – remediation planning • four – site remediation. Note that funding is not available for phase one (desk top study).
4	Funding is only requested for the years in which the site investigation, remediation planning and site remediation are undertaken.
5	Funding may not be used for retrospective costs (ie, for work undertaken before the application form was received by the Ministry) or for works undertaken that are outside the scope of the funding deed.
6	The application must be received from a regional council/unitary authority.

Assessment Criteria	
Criteria	Guidance
Partnerships	Is there a demonstrated partnership between the regional council/unitary authority and other interested parties?
Risk	Does the site pose (or potentially pose) significant risk to human health or to the environment?
Project management	Has the project manager and/or regional council/unitary authority: <ul style="list-style-type: none"> • demonstrated their project management expertise using best practice project management methodologies and tools • established appropriate project management structures • demonstrated capability to undertake the project (including the practicality and feasibility of the proposed actions)?
Priority	Does the site hold a ranking on the CSRF Priority List?
Responsibility	<ul style="list-style-type: none"> • Does funding reflect the responsibility for the contamination? • Does the landowner/occupier's contribution towards the project costs reflect their degree of responsibility for contaminating the site (fully or partially)?
Capability	<ul style="list-style-type: none"> • Do contributions from other parties reflect on their ability and/or willingness to contribute to the project?

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