

# CONTAMINATED LAND POLICY

## ARV Corporate Policy

### 1. Statement

This policy outlines Alpine Resorts Victoria's (ARV) commitment to identifying, managing, and mitigating risks associated with contaminated land across its alpine resort areas. As a municipal council under the Environment Protection Act 2017 (EPA Act), ARV is a duty holder, responsible for ensuring compliance with EPA Victoria's Contaminated Land Policy and associated regulations. ARV must also identify, manage and safely remove asbestos-containing materials (ACMs) in accordance with the Occupational Health and Safety Act, associated regulations and EPA guidelines. The policy aims to protect human health and the environment by preventing harm from contaminated land and ensuring responsible classification, transport, and disposal of industrial waste.

### 2. Scope

This policy applies to:

**Who:** All ARV employees, contractors, consultants, and stakeholders involved in land management, development, and waste handling.

**What:** Identification, management, remediation, and reporting of contaminated land; classification and transport of industrial waste; and asbestos management. Common contaminants include hydrocarbons (e.g. fuel spills), heavy metals (e.g. lead, arsenic), pesticides and herbicides and PFAS (polyfluoroalkyl substances, e.g. firefighting foam).

**When:** During land development, general operations and maintenance, use of hazardous chemicals, waste disposal, and environmental assessments.

**Where:** Across all ARV-managed alpine resorts and associated facilities.

**Why:** To comply with the EPA Act and the Occupational Health and Safety Act to reduce risks of harm from contaminated land and other contaminants including asbestos.

**How:** Through implementation of procedures, training, monitoring, and enforcement mechanisms.

Policy principles:

<b>Accessibility</b>	This policy is published on the ARV intranet and communicated to all relevant stakeholders.
<b>Alignment</b>	This policy supports ARV's strategic objectives for environmental sustainability and regulatory compliance.
<b>Consistency</b>	This policy aligns with EPA Victoria's Contaminated Land Policy and other relevant state legislation.
<b>Informed</b>	This policy is based on current environmental science, EPA guidelines, and industry best practices.

**Implementation** This policy is communicated through staff training, operational procedures, and contractor agreements.

**Human Rights** This policy considers obligations under the Occupational Health and Safety Act 2004 and Human Rights Act 2019, particularly the right to a safe and healthy environment.

### 3. Requirements

ARV must undertake the following mandatory actions to ensure compliance with the Environment Protection Act 2017, EPA Victoria's Contaminated Land Policy and the Occupational Health and Safety Act:

#### Conduct Site Assessments

- Perform preliminary site investigations before any land development or major maintenance works.
- Engage qualified environmental consultants to conduct detailed assessments where contamination is suspected.
- Conduct asbestos audits for buildings and infrastructure prior to refurbishment or demolition and engage licensed asbestos assessors and removalists for any work involving ACMs.
- Use EPA Victoria's guidelines to determine the presence, extent, and risk level of contamination.

#### Maintain Registers of Contaminated Sites

- Establish and regularly update a central register of known or suspected contaminated sites and utilise established processes to manage EPA notices and remediation actions.
- Include details such as location, type of contamination, risk level, management actions, remediation status, and monitoring requirements.
- Include ARV-managed properties with asbestos-containing materials (ACMs) in registers.
- Ensure registers are accessible to relevant staff and contractors for planning and operational purposes.

#### Classify and Transport Industrial Waste

- Follow EPA Victoria's waste classification framework to identify whether waste is industrial, hazardous, or prescribed.
- Ensure waste is packaged, labelled, and transported according to EPA regulations.
- Maintain documentation of waste classification, transport routes, and disposal methods for audit and compliance purposes.

#### Engage EPA-Licensed Waste Receivers

- Only use EPA-licensed facilities for the disposal of industrial and contaminated waste, including asbestos.
- Verify licenses and capabilities of third-party waste receivers before engagement.
- Retain records of waste transfer certificates and disposal confirmations.

#### Report Contamination Incidents

- Use the Contamination Hazard/Incident Reporting Guidance (below) and Process Map (Figure 1) to identify if a hazard or incident is reportable.
- Immediately report contamination incidents or discoveries to EPA Victoria as required under the EPA Act.
- Report asbestos-related incidents to WorkSafe Victoria and EPA Victoria as required.
- Follow ARV's internal incident reporting procedures, including notification to relevant General Managers and Head of Environmental Sustainability.
- Cooperate fully with Victorian WorkSafe and/or EPA investigations and provide requested documentation and access.

## **Integrate Contamination Risk Assessments into Planning**

- Require contamination risk assessments and/or confirmation of contaminated land status using [Victoria Unearthed](#) as part of major new development proposals and/or refurbishments.
- Include contamination mitigation strategies in planning permits and contractor scopes of work.
- Ensure planning decisions consider long-term environmental and health impacts of land use.

## **Provide Training to Staff and Contractors**

- Provide staff training sessions on contamination, including asbestos - identification, reporting, and management.
- Include EPA compliance obligations and ARV procedures in induction programs for new staff and contractors.
- Maintain training records and evaluate effectiveness through audits and/or feedback.

## **Guidance - Contamination Hazard/Incident Reporting**

[Duty to notify Authority of a notifiable incident | epa.vic.gov.au](#)

[Duty to notify of contaminated land | epa.vic.gov.au](#)

[Permission notifications | epa.vic.gov.au](#)

A pollution incident must be reported to EPA if it causes or threatens material harm. Material harm is where:

- there is an adverse effect on human health or the environment
- there is an adverse effect on an area of high conservation value or of special significance
- the clean-up or management of the pollution or cost of restoration would cost \$10,000 or more.

A commonsense approach should be taken. Examples of when an incident might not need to be reported are:

- A small spill that has been contained and cleaned up on site, with no leaking through concrete and other barriers.
- A release has happened, but it cannot migrate to the land or to stormwater drains, and it will cost less than \$10,000 to clean up.
- The escaped substance has no known risks, and the site can be easily restored.

Risks to the environment and/or human health must be understood and managed, as well as the risks of the substances involved. Some substances are not dangerous to handle but can still harm the environment.

EPA Victoria (and WorkSafe Victoria if applicable) must be notified as soon as practicable after ARV staff:

- become aware of the incident, or
- reasonably should have been aware that the incident had happened.

EPA Victoria must be notified even when the incident is contained to your property or site.

This is the [duty to notify Authority of a notifiable pollution incident](#).

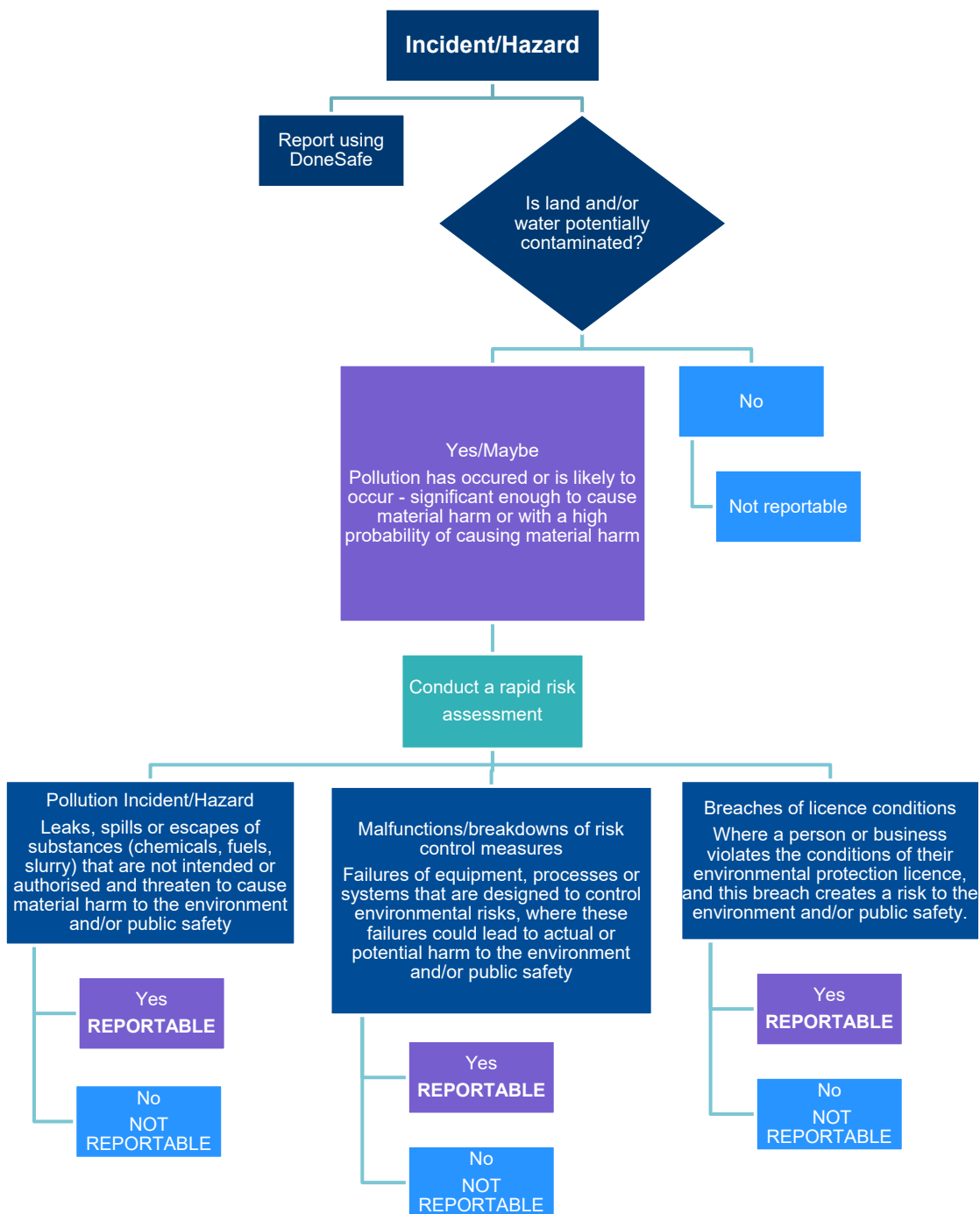
Call the 24-hour pollution hotline on **1300 372 842**

The duty applies even if actual harm has not happened yet.

To report, visit [Report a pollution incident](#).

- Examples of the types of incidents to report include where:
  - the release of a substance is uncontrolled or unplanned and could cause material harm
  - the substance is harmful to water or land in large quantities, such as fuel or organic materials
  - clean-up of the substance is expensive
  - the substance is dangerous or toxic and threatens the environment or people

**Figure 1 – Contamination Hazard/Incident Reporting Process Map**



## 4. Responsibilities

Position	Responsibility
Board	Accountable for meeting the objectives of and compliance with legislation and government policy relating to land contamination.
SPAMCO	Policy approval, implementation and compliance oversight.
CEO	Organisational leadership to maintain and improve performance and compliance.
General Managers	Compliant resort operations, contractor agreements, record keeping and liaison with WorkSafe Victoria and/or EPA Victoria.
Head of Assets Portfolio Management	Oversee due diligence and provide advice and assistance in relation to compliance, policies, plans and procedures. Oversee asbestos audits and ensure compliance with removal protocols.
Head of Property and Planning	Keep the central contaminated land and asbestos register and integrate contamination risk assessments and/or use of <u>Victoria Unearthed</u> into development planning where applicable.
Head of Environmental Sustainability	Oversee implementation of contamination assessments and remediation plans.
Head of Governance and Risk	Assist Resort GMs to maintain documentation and liaise with WorkSafe Victoria and/or EPA Victoria as appropriate.
Head of People and Culture	Staff/contractor induction and training and incident reporting, including asbestos awareness.
Resort Head of Assets and Operations	Ensure operational activities comply with contamination management procedures, including classification, transport and disposal and maintain the contaminated land register, including ARV-managed sites with ACMs.
Contractors and consultants	Comply with ARV contamination protocols and Victorian WorkSafe and EPA regulations.

## 5. Legislation

Environment Protection Act 2017 (Vic)

Environment Protection Regulations 2021 [Environment Protection Regulations 2021 | legislation.vic.gov.au](https://legislation.vic.gov.au)

EPA Victoria Contaminated Land Policy 2021 [Contaminated land policy | epa.vic.gov.au](https://epa.vic.gov.au)

Environmental Reference Standard 2021 [Environment Reference Standard | epa.vic.gov.au](https://epa.vic.gov.au)

Planning and Environment Act 1987 and Regulations 2015

(includes Ministerial Direction No. 1 – Potentially Contaminated Land and Planning Practice Note 30)

Catchment and Land Protection Act 1994 and Regulations 2022

National Environmental Protection (Assessment of Site Contamination) Measure 1999 (NEPM; *Cth*)

Australian Drinking Water Guidelines 2011

Human Rights Act 2019 (Vic)

Occupational Health and Safety Act 2004 and Regulations 2017 (including Part 4.1 Asbestos)

Dangerous Goods Act 1985 and (Storage and Handling) Regulations 2022

## 6. Related documents

EPA Victoria: Duty to Manage Contaminated Land [Duty to manage contaminated land | epa.vic.gov.au](#)

EPA Victoria: Duty to Notify of Contaminated Land [Duty to notify of contaminated land | epa.vic.gov.au](#)

EPA Victoria: [Duty to notify Authority of a notifiable incident | epa.vic.gov.au](#)

EPA Victoria: [Report a pollution incident | epa.vic.gov.au](#)

EPA Victoria: [Duty to notify of contaminated land | epa.vic.gov.au](#)

EPA Victoria: [Guidance for the duty to notify of contaminated land | epa.vic.gov.au](#)

EPA Victoria: [Permission notifications | epa.vic.gov.au](#)

EPA Victoria: [Respond to harm caused by pollution | epa.vic.gov.au](#)

EPA Victoria: Contaminated Land – Understanding Section 35 of the EP Act [Contaminated land: Understanding section 35 of the Environment Protection Act 2017 | epa.vic.gov.au](#)

EPA Victoria: Guidelines for asbestos waste management [Laws and guidance | Asbestos](#)

WorkSafe Victoria: Compliance code: Managing asbestos in workplaces [Compliance code: Managing asbestos in workplaces | WorkSafe Victoria](#)

ARV Risk Management Policy and Framework [Risk Management](#)

ARV Environmental Sustainability Policy [ARV Environmental Sustainability Policy Approved.pdf](#)

## 7. Definitions

For the purposes of this policy, the following definitions apply:

Term	Definition
Asbestos	A naturally occurring mineral made up of millions of tiny, strong, heat-resistant fibers, used in building and construction products. Exposure is a known serious health hazard.
Contaminated land	Land containing substances that may pose a risk to human health or the environment.
Duty holder	Any person or organisation responsible for managing contaminated land under the EP Act.
Industrial waste	Waste arising from commercial, industrial, or trade activities requiring classification and licensed disposal.
Material harm	An event that: Impacts human health or the environment Affects an area of high conservation value or special significance Requires \$10,000 or more to prevent or minimise harm
Remediation	Actions taken to reduce or eliminate contamination from land.

Reportable incidents	Incidents that cause or threaten to cause material harm to human health or the environment, and specific incidents related to breaching licence conditions or failure of risk control measures. Includes unintended releases of substances, failure of risk controls that could lead to harm and breaching a licence condition.
EPA Victoria	Environment Protection Authority Victoria, the regulatory body overseeing environmental protection.

## 8. Approval and implementation

Policy Custodian	Policy contact details	Approval Date	Approver
Assets, Land Management and Strategic Development General Manager	<a href="mailto:policyregister@alpineresorts.vic.gov.au">policyregister@alpineresorts.vic.gov.au</a>	November 2025	SPAMCO

## 9. Version Control

Version Number			
<b>Document Reference:</b>	ARV-CORP-ENV-0072	<b>Policy Custodian:</b>	GM ALMSD
<b>Approved By:</b>	SPAMCO	<b>Approval Date:</b>	6/11/2025
<b>Last Amended:</b>		<b>Next Review Date:</b>	6/11/2026
<b>Comments:</b>			