

# Comments log for Draft 1.0 - outline structure and contents

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Section	Comments
<b>GENERAL</b>	
	I have had a quick look at the contents list and it looks pretty comprehensive. However the order of the contents is very much that of a technical report i.e. all the history, background rationale etc before the meat of the guidance (even the principles are left to the end!). Can I suggest we change the order around when we produce the final document?
	I support Andy Thomas' comments; the contents list looks comprehensive, but I too would prefer to see the guidance provided up front (or stand alone
	A glossary of terms and definitions is required (Jeff: Getting the definitions right will be important and consultation on this will be required).
	The National Coal Board Records might be a good analogue in the long term so when one is buying a house / land the searches would automatically tap into the information Nirex have done quite a lot of work in this area Paper/mircofilche seen as the answer for the very long term but I'm not sure why in the short/medium term electronic formats wouldn't be appropriate we just need to ensure that money is available to keep the databases and information current. S'field is different to a lot of the sites in that it will be under active management for the next 70+ years, so although we need to ensure good short / medium term management the real long-term need not be an issue for a few years yet. We do have comprehensive procedures on record management for this time period on site and its the real long term i.e after delicensing that we would be looking for guidance on.
<b>1 Introduction and Background</b>	
	Safegrounds context or the subsection cross ref to existing SAGEGROUNDS docs. Hopefully by the time this doc gets finalised we will have the flow diagram for the LMG2 in place. I suggest that the draft version of the flow diagram is used with the records part highlighted. (!I'll be sending Jeff a version of this flow
1.1	diagram soon - which includes a chunk on records).
1.2	Add new bullet 'Societal drivers for enhanced record-keeping'
<b>2 Scope of records to be held</b>	
2.1	After: "Land quality information from", insert: "pre-use surveys and current"
2.1	Add a new bullet: "Records of site intervention"
2.1	Other than buildings, infrastructure needs to be included especially drains.
2.1	Add in something about referencing systems - eg locations tied to a national system, not to a site system or a proximity to a building (which might get demolished)
2.2	Re.your first bullet: Be cautious that safety cases do not necessarily address all aspects of contaminated land - indeed may be limited to those parts of site that pose a significant risk to human health - and are not a basic data source but a document that has used the basic data.
2.2	Add a new bullet: "Records of source terms". I.e. of material buried in the ground (including authorized disposals on site) and liquid material that has leaked into the ground or arrived by other means e.g. aerial deposition, solid & liquid spills, the results of fire-fighting operations, movements onto the site the site in question from an adjacent site (a genuine situation) Para 2.3 As discussed, in the heading replace: "areas", with "topics".
2.2	Add contaminated land assessment and evaluation records (eg risk assessment, fate and transport modelling)
2.2	"Records of decision making" add- "AND STAKEHOLDER CONSULTATION"
2.2	The context of investigations and remediation also needs to be recorded - eg what are the "clean-up" criteria and what are they based on.
2.3	I have concern over the use of the work "project". Land management is a continual duty from the grant of a site licence until the site (or the relevant part of it) is "delicensed". (On a more general point, please note that "delicensed" is not a formal term - I can elaborate if you wish)
<b>3 Drivers and responses</b>	
3.2	Change 'Transparency' to 'Openness, Transparency, Accountability and Trust-building'

3.3	include in this some sort of statement about the cost of data management v the cost of reinvestigation. Also the cost benefit of not exposing the investigator to contamination more than once (by avoiding a repeat investigation)
<b>4 Record keeping systems and associated protocols</b>	
4, bullet 6	6th bullet, final sentence - We should be presuming land management matters are unclassified unless specifically determined not to be - the Fol act and the Environmental Information legislation is relevant here (and Part IIA of EA90 may well bite here too).
4, bullet 6	Add new section to the 6th bullet 'Potential for enhanced access to information regimes in the context of stakeholder trust-building'
<b>5 Good practice guidance</b>	
5.3	The first bullet may look more appropriate as an appendix.
5.3	I would suggest that we introduce here a real summary of the fundamental things that are required in order to achieve appropriate records management.
<b>References and appendices</b>	