

ESPERANCE CLEANUP AND RECOVERY PROJECT

MINUTES OF THE STEERING COMMITTEE MEETING

26 MARCH 2009, ESPERANCE

Present:

Mr Michael Jackson	Co-ordinator, Esperance Community Consultations [Chair]
Mr Martin Matisons	Dept of Health (DOH)
Mr Lindsay Gillam	Dept of Health (DOH)
Mr Peter Skitmore	Dept Environment and Conservation (DEC)
Mr Mark Whiteley	Dept Environment and Conservation (DEC)
Ms Caron Goodbourn	Dept Environment and Conservation (DEC)
Dr John Ottaway	Esperance Cleanup and Recovery Program (ECRP)
Mr John Fischer	Dept Planning and Infrastructure (DPI)
Ms Pam Norris	Locals for Esperance Development (LED)
Ms Michelle Crisp	Locals for Esperance Development (LED)
Mr Richard Grant	Esperance Port Authority (EsPA)
Dr Charles Douglas	Department of Health (DOH)
Mr Marcus Tromp	Esperance Chamber of Commerce and Industry (ECCI)
Ms Jenny Brodie-Hall	Community Representative
Mr Peter McCafferty	Chemistry Centre
Mr Adam Rayner	Dept Environment and Conservation (DEC)
Mr Paul Clifton	Shire of Esperance
Ms Samantha Parkyn	Esperance Cleanup and Recovery Program (ECRP)
Ms Janet Done	Shire of Esperance

Apologies:

Ms Sharon Clark	Landcorp
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1. Opening of Meeting and Review of Agenda

The Chair welcomed Members and gave an overview of the agenda and anticipated outcomes of this meeting.

2. Membership of the Steering Committee

Ms Jenny Brodie-Hall was welcomed as a new community representative to the Steering Committee.

Ms Samantha Parkyn and Ms Janet Done were also welcomed to assist in recording the Steering Committee discussions.

Members noted that Marcus Tromp, Pam Norris and Michelle Crisp had recommended to Members by email prior to the meeting, that a further community member should be appointed to the Steering Committee. Councillor Nigel Walker was recommended, and had been asked if he was available. Marcus Tromp advised that Cr Walker had advised that the request should be put to full council for them to recommend a representative. Members agreed to seek a nomination from the Shire Council to nominate a representative for the Steering Committee.

Action: DPI to write to Shire of Esperance seeking a Council representative.

3. Minutes of Previous Meetings and Table of Actions

i. Minutes of meeting held 11 December 2008:

- Page 1 Item 1 The objectives of the Esperance Cleanup and Recovery Project should be amended as follows:

“To assess/audit levels of lead and nickel in homes, premises and public places in Esperance and determine the need for cleaning by reference to agreed standards and guidelines.”

- Page 3 – include dot point on recontamination issues ie: “To determine whether lead is re-circulating within the community.”
- ‘Summary Report’ to be amended to read ‘Minutes’.

Action: That the minutes of the meeting held 11 December 2008, with the above amendments, were accepted as a true record of the meeting.

ii. Minutes of the meeting held 8 February 2009:

- Page 1 Item 1 iii DOH to consult with the Chemistry Centre regarding the development of appropriate cleanup standards (delete ‘determination’).
- Page 6 Item 8 ii LED members include ‘previously’ expressed concern.

Action: That the minutes of the meeting held 8 February 2009, with the above amendments, were accepted as a true record of the meeting.

Amended Minutes to be circulated to Members and loaded onto the ECRP web page.

4. Terms of Reference of the ECRP Steering Committee

Members noted:

- Draft Terms of Reference for the Steering Committee which had been prepared by John Fischer taking into consideration the Draft prepared by Pam Norris and subsequent Members comments.
- Concern was expressed by Pam Norris that as facilitators and overseers of this project, the committee would be responsible for outcomes. That the amended Terms of Reference, which were substantially different from the original, only gave the committee an advice and recommendation role and do not allow the Steering Committee the ability to influence how their advice and recommendations are delivered. Suggested to amend clause 2 Purpose to read:

“The Esperance Cleanup and Recovery Project Steering Committee has been established to oversee and facilitate the project, to provide advice and recommendations to the project team and provide independent advice to the Minister for Transport.”

- With respect to clause 6 concerning the decision making process, it was agreed that a further provision would be added as follows:

“The decisions of the Steering Committee will, as far as practicable, be implemented by the Project Team where practicable.”

- With respect to the outcomes of the project in clause 3, it was agreed that the term “properties” should be replaced with the word “premises”.
- Further in the third dot point of the outcomes: this should refer to ‘household public health’.
- The need to identify in the Terms of Reference that reference to ‘lead’ refers specifically lead from the Magellan Metals mine. Lead from other sources such as lead flashings, recreational and occupational sources are not covered by the ECRP. Further discussion of this point was that lead other than Magellan would be very isolated and could be dealt with on a case by case basis.

- The Membership of the Steering Committee should be amended in view of the discussion to seek a further community member from the Shire Council.
- With respect to clause 5 concerning the relationship between the Steering Committee and other Committees, it was agreed that an additional clause be added to specify that “a report on matters relating to the cleanup, discussed at the IAC, will be presented to the Steering Committee.”

Members agreed that the Terms of Reference, as amended, would be circulated to members as a final document and recommended to the Minister for endorsement. The [final] Terms of Reference are set out in Attachment 2.

Action: Terms of Reference to be amended as above, circulated to Members as a final document and submitted to the Minister for endorsement.

5. Update on Funding Allocation for Cleanup and Recovery Project

Members noted:

- That a submission for funding of the ECRP was under consideration by government.
- The Deed of Settlement with Magellan Metals provided for a total of \$9million to be paid in instalments of \$3million over the next three years. The first instalment is due December 2009.
- Advice from Richard Grant that the EsPA had spent about \$3million in cleanup operations of rainwater tanks and homes of children with elevated blood lead levels.

6. Report by Project Director, Dr John Ottaway

Members noted a progress report from Dr John Ottaway and in particular:

- Telephone and computer lines at the DPI Esperance offices should be operational very shortly
- Ms Samantha Parkyn had been appointed as Office Manager/ Administrative Support. Samantha had commenced 20 March 2009.
- Applications for the position of Project Manager ECRP had closed; interviews intended to be conducted early April.
- A briefing was given on the need for a data management system which could be adapted for internet access to enable the ECRP data to be entered, analysed and accessed at various levels. Project Director provided recommendations to adapt the system used by the DOH. This would require the purchase of additional software licences, and could be upgraded to allow other Departments access to information while maintaining appropriate levels of security. Estimated cost \$128,000 (\$88,000 for licenses, \$40,000 for in house development and resource assistance of 2 days/week for one year, plus external software development assistance). To set up this system would take about 8 to 10 weeks for a systems specialist working 2 days per week and then require a part time data manager within DOH for 2 days per week. Members agreed that such a data management system was essential for the data generated in the ECRP and for subsequent analysis. and that this work should proceed as a priority.
- The results of a trial of the Niton hand held XRF of a range of sample types in Esperance [soils, ceiling dusts, carpets vegetation and gutter sludge]. The main advantage of the Niton is that it gives very rapid results [within one minute] and the GPS coordinates and stored in an electronic file which can be downloaded into a computer database. From US EPA literature reports and on the data generated on soil samples, provides good correlation to laboratory results. Cost approx \$75,000 per unit; sampling results \$1 compared to \$30 for lab results. The Limit of

Detection for lead is 5ppm and for nickel 50ppm. Members discussed the use of Nitons and recognised the efficiency gains and cost savings with instant results. The Project Director recommended the purchase of Niton units for use as the basis for ongoing sampling requirements.

- Members recognised the need to set a percentage of key samples for laboratory analysis, such as internal dust samples which require analysis below the limit of Niton detection and as confirmation of validity of Niton readings.
- Advice from Dr Ottaway that the intensive sampling of 21 homes had been an extremely useful exercise. For example, it showed the difficulties of obtaining the written consent to enter homes. Many homes which had been identified in the intensive sampling project were either vacant or rented and it had been difficult to gain approval to enter. In several cases this meant seeking multiple consents from owners etc. On the broader scale of the ECRP, seeking written consent from home owners is envisaged as major task which will have to be undertaken efficiently. Nevertheless the intensive sampling project had provided a good basis for improving future sampling processes and techniques to achieve maximum efficiency.
- The Project Director recommended that the next priorities are:
 - Setting up the data management system
 - Determination and implementation of appropriate means to assess whether recontamination is occurring.
 - Determination of further sampling
 - Determination of numbers of premises to be cleaned
 - Determination of cleanup standards
 - Preparation of draft cleaning protocols
 - Trial cleaning of homes to test cleaning protocols and effectiveness of techniques preparation of detailed cleanup plan and schedule
 - Implementation of detailed cleanup plan.

7. Cleanup Standards for Esperance recommended by DOH

Members noted:

- Correspondence from Martin Matisons, Principal Toxicologist DOH setting out recommended cleanup standards for Esperance.
- The following standards were recommended for adoption which are based on National Guidelines.
 - *Rainwater tanks*: 0.01 mg/L for lead and 0.002mg/L for nickel.
 - *Soils*: 300mg/kg for lead; and 600mg/kg for nickel.
- The Health Investigation Level for soil takes into consideration a standard residential setting with accessible soil and garden contributing less than 10% of vegetable and fruit intake. The level allows for plants to be grown in the soil and ingestion of some soil by young children.
- The following standards for cleanup of homes in Esperance.
 - *Internal and external surfaces readily accessed by young children*: 0.04µg/cm² for lead. This includes floors. External surfaces include play equipment.
 - *Other internal surfaces*: 0.25µg/cm² for lead
 - *External surfaces readily accessed by adults*: 0.4µg/cm² for lead
- Cleanup standards for roof spaces, hard stand areas, garages and other buildings are still to be determined by DOH. In the absence of national and international standards, DOH will recommend standards based on background levels in similar urbanised areas in Australia and overseas. DOH had undertaken sampling of homes in Albany to provide information for this purpose.

- There was discussion on soil levels and some members expressed concern that 300mg/kg may not be low enough to prevent recontamination of homes. This concern was based on evidence that despite soil levels being below 300mg/kg, contamination of birds, the environment and raised blood lead levels in the population had occurred.

Action: DOH to provide further advice on cleanup standards to be applied to roof spaces, hard stand areas, garages and other buildings based on the data from sampling in Albany and other sources.

8. Sampling of Benchmark Homes in Albany

Members noted:

- That DOH and the Chemistry Centre had carried out sampling of homes in Albany during the period 23 to 25 March 2009.
- Eleven (11) City of Albany staff homes had been selected across a range of locations in the town and sampled, providing a good representation of styles, ages, building types and locations. Samples were taken from ceiling spaces, external and internal areas, soils and rainwater tanks. Analysis of samples had commenced at the time of the meeting.
- That the same sampling procedures were used by DOH as had been used in Esperance.
- Michelle Crisp advised that Dr Carin Lung a PhD graduate from Sweden is currently conducting heavy metal analysis at UWA of soil samples she has recently taken from various locations in Esperance. Ms Crisp recommended that DOH contact Dr Lung on this matter. Dr Lung was written a thesis on Metals in urban playground soils and Michelle also advised Swedish EPA recommendations for lead in playground soils is 80mg/kg.
- Pam Norris advised that Dr Andrea Hinwood of Edith Cowan University is supervising research into lead levels in hair, fingernails and urine in Esperance children. The advantage of these tests are that they are non invasive. The sampling would be conducted in April 2009. [DOH had previously advised that hair and nail samples had been assessed in other research and were not considered to be a good matrix for determining exposure].
- DOH recently invited families to undertake further biological testing, there were no volunteers at that time although one family has since been in contact with the Department. Dr Douglas advised that blood lead testing of Esperance children had virtually ceased as parents were reluctant to subject their children to any further blood lead testing. Pam Norris asked if pinprick sampling could be considered as perhaps it would be less traumatic. DOH advised in their opinion it was just as traumatic and not as reliable.
- That strategies need to be considered to minimise 'walking in' lead from external areas, and particularly soils, to internal areas of homes. This is because of the potential for lead dusts to be concentrated in the top few centimetres of the soil profile. Possible strategies include removing the contaminated soil, and the lead dusts in the top layers also top dressing, mulching and rotary hoeing.
- EsPA testing of employees had shown that lead levels had returned to 'normal' levels.
- That the monitoring of 'sentinel' homes in Esperance over a period of about 5 years, would provide important ongoing data on recontamination of homes.

Action: DOH to contact Dr Carin Lung on the results of research on heavy metal analysis of soils in Esperance.

9. Discussion of Confidential Information by Steering Committee Members

Members noted:

- Data and information generated from the intensive monitoring project would potentially contain confidential information relating to the address of the property and the degree of contamination. Such information needed to be considered and discussed by the Steering Committee on a strictly confidential basis.
- Government Officers were required to adhere to strict confidentiality conditions in the normal course of their employment.
- Property owners will be provided with a copy of the results of testing for their particular premises, by the ECRP Project Director.
- That a protocol should be developed to address the handling of confidential information by the Steering Committee.

Action: DPI to prepare a Protocol on the confidential handling of information by Steering Committee Members.

10 Discussion of Sampling and Results of Intensive Testing of 21 Homes

Members noted:

- Peter McCafferty provided a summary of the results of the intensive testing of 21 homes. The results covered both lead and nickel concentrations in samples taken from carpets, internal surfaces, external surfaces, roof spaces, soils, rainwater, plants and vegetables.
- Homes nearest the port had the highest levels of lead and nickel in soil.
- The amount of total material and metal levels in ceiling voids varied greatly with the roof construction materials.
- That the data will be further analysed and DOH will put the data into a form which will enable all Members to readily interpret the data.
- These results will be made available to Members at the next meeting.

Action: CC and DOH to assemble data from the intensive sampling project into a form which will enable Members to readily interpret the data, for consideration at the next meeting.

11 Is Remobilisation of Lead Occurring in the Esperance Environment?

Members noted:

- That the Steering Committee had at its previous meetings considered that it was necessary to determine if lead and nickel is being remobilised around the Esperance townsite.
- That the Project Director had identified this as a further priority and had proposed that a Working Group be established to firm up details on an appropriate sentinel monitoring proposal and then to proceed to implement. The Project Director used as an example the sentinel monitoring system that has been established in Port Pirie.
- Advice from Peter Skitmore on this issue as follows:
 - *All the high vol data shows extremely low levels on those odd days when it is above limit of detection. With the exception of DG 13 all the community dust gauges show levels below the limit of detection. This indicates that lead is not being measured moving around the environment in the air.*
 - *The last years DEC vegetation survey showed consistent reduction in new growth compared to old growth indicating reducing lead on new leaves. DEC's March 2009 vegetation survey has been completed and*

DEC are awaiting the analysis results. This is a more comprehensive survey than done in 2008 with vastly improved Quality Assurance and scientific rigor. It has also specifically included 15 samples of deciduous trees to focus on recirculation of lead during a known period of leaf exposure (Oct to March) to lead. These are from geographically different areas so should also indicate any localised higher levels of lead deposits. Data awaited on these also.

- *The bird feather work by Conservation Council WA showed very significant reduction in lead levels on bird feathers in Oct 2008 (5 months ago) when compared to Oct 2007. This showed significantly less lead in the environment for the birds to pick up.*
- *Based on these data (subject to the latest vegetation study results) Mr Skitmore concluded that there is no evidence of significant or even consistently measurable recirculation of airborne lead in the environment and considerable evidence that it is not recirculating.*
- *Three additional high vols at distances further from the port are proposed..”*

12. Future Planning and Timelines for the Cleanup and Recovery Project

Members noted:

- That having completed the intensive sampling of 21 homes, the Steering Committee needed to determine what actions should be taken next in the ECRP.
- A paper by the Project Director on:
 - The determination and implementation of further sampling (environmental survey, premises survey and intensive survey of premises to be cleaned.)
 - The need for reasonably precise determination of the numbers of premises to be cleaned and to what extent, so that tender documents could be prepared and advertised.
- The Project Director proposed three surveys as follows:
 - General environmental survey of Esperance-with 8 teams for 6 weeks (\$120,000) to provide a comprehensive assessment of how far the contamination has spread in Esperance and what are the quantities and concentrations in the general environment
 - General survey of all premises [including homes, commercial premises, schools, playgrounds, parks and tourist accommodation] with 8 teams for 6 weeks (\$120,000) to identify which premises require some level of cleanup and those that do not require cleanup.
 - Intensive survey of premises requiring cleanup with 8 teams for 6 weeks (\$120,000) based on 800 premises requiring some level of cleanup to determine exactly what is required for each premises.

[These proposals are referred to as Option 1 below]

- The Project Director recommended that a Working Group be established with representatives from DEC, DPI, DOH, CCWA and community to firm up the details of the above three surveys and then proceed to implement them.
- Advice from community representatives that the community would not necessarily be against a delay of the clean up work provided the reasoning was made clear that more data are needed was made clear.
- Peter Skitmore expressed some concern that he believed if the cleanup is delayed for 4 months and into another season, the data generated in surveys would become out of date.

As a second option some Members had previously recommended that when the results of the intensive sampling program were available and assessed, this would

provide a “ball park” estimate of the area of homes requiring cleaning, and those homes sampled in the intensive monitoring project requiring cleaning would be cleaned. This would enable the development of sampling and cleaning protocols. Experience gained in the cleaning of these homes and subsequent validation of the cleaning process would enable refinement of the cleaning protocols. Once these protocols had been established, tenders would be let and subsequently the cleaning of homes on a larger scale would begin. Under this option, sampling, cleaning and validation would be conducted on a stepwise process moving radially outward from the port until such time as cleaning was no longer necessary. Under this option cleaning of homes would, most likely, begin at an earlier date.
[This proposal is referred to as option 2]

Members discussed the two options identified above.

Members agreed that both options identified should be implemented simultaneously whilst recognising the associated staffing implications.

Actions:

- 1. Project Director to co-ordinate the development of sampling and cleaning protocols.**
- 2. Project Director to prepare a program to implement simultaneous further sampling and cleaning of homes and to identify the resources required.**
- 3. Project Director to convene a Working Group to examine what further survey and sampling is needed to determine the extent of the contamination in the Esperance townsite and in individual premises, and to make recommendations back to the Steering Committee.**
- 4. A second Working Group to be convened by the Project Director to consider the issue of remobilisation of lead and nickel in the Esperance environment taking into consideration all available data and to make recommendations back to the Steering Committee.**

13. Access to Relevant Information by the community

i. ECRP Fact Sheet

Members noted a draft Fact Sheet on the Esperance Cleanup and Recovery Project. It was agreed that this Fact Sheet needs to be reviewed in light of the decisions taken at this meeting and be more succinct - preferably one page.

Action: Project Director to revise the ECRP Fact Sheet, circulate to members and for this to be loaded onto the website.

ii. Website Development

Members noted that DPI is developing a dedicated website for the ECRP.

14. Golder Esperance Townsite Risk Assessment

Members noted that the Risk Assessment Report by Golder Associates should be available end of April/beginning of May. A presentation to the community of the findings by Golder could be conducted in conjunction with the next meeting of the steering Committee.

15. Visit by Mark Springer USEPA

Members considered:

- The proposed visit should be deferred for the time being. There may be value in inviting him over at a later stage.

- Advice of Dr Sprenger should be sought on the recirculation of lead and nickel in the Esperance environment.

Action: Seek advice of Dr Sprenger on the recirculation of lead and nickel in the Esperance environment.

16. Next Meeting

Members considered that potential dates for the next meeting were 23rd or 30th April depending on the analysis of the intensive sampling data by DOH and CCWA.

Meeting closed: 6.45pm

Attachment 2

**ESPERANCE CLEANUP AND RECOVERY PROJECT
STEERING COMMITTEE
Terms of Reference**

1. BACKGROUND

The *Inquiry into the Cause and Extent of Lead Pollution in the Esperance Area* by the Education and Health Standing Committee, tabled in the Legislative Assembly on 6 September 2007 provides a definitive background.

The Inquiry showed that as a result of emissions of lead from the Port of Esperance, residential and commercial premises in the town of Esperance, as well as the environment, were contaminated by lead dust, with consequential impacts on the community including elevated blood lead levels in children.

Significant lead, and to a lesser extent, nickel contamination of the town of Esperance remains. Whilst some cleanup has occurred in the town, the Esperance community has sought a comprehensive cleanup of the town.

In November 2008, the Western Australian Government gave a commitment to comprehensively clean-up this contamination. The Department for Planning and Infrastructure has been appointed as the lead agency for the cleanup project and has established an Esperance Cleanup and Recovery Project team to undertake the task.

Note: references to lead in this document refer to lead carbonate from the Magellan mine, which emanated from the Port of Esperance.

These Terms of Reference are endorsed by the Minister for Transport.

2. PURPOSE

The purpose of the project is to undertake the comprehensive clean up of lead and nickel contamination in the town of Esperance, to meet standards established by the Department of Health.

The Esperance Cleanup and Recovery Project Steering Committee has been established to oversee and facilitate the project, provide advice and recommendations to the project team, and provide independent advice, as required, to the Minister for Transport.

3. ROLES AND OBJECTIVE

The objective of the Esperance Cleanup and Recovery Project (ECRP) is to ensure that the cleanup meets the appropriate standards and is undertaken in a way that minimises the impact of the cleanup on the Esperance community.

The outcome of the project is:

- For individual premises to be cleaned of lead and nickel contamination;
- To demonstrate to the Esperance Community that the town site has been cleaned of lead and nickel contamination; and
- For Government agencies to remove restrictions and guidelines related to public health introduced to counter lead and nickel contamination in Esperance.

The role of the committee is to provide advice and recommendations on:

- 3.1 The plan and processes to determine the extent of the lead and nickel contamination in the town of Esperance;
- 3.2 The standards adopted for the cleanup;
- 3.3 The plan and processes to undertake the cleanup of premises including the scope of the cleanup in the area identified by 3.1 above, to the agreed cleanup standards;
- 3.4 The plan and process proposed to demonstrate that the cleanup has achieved the agreed cleanup standards;
- 3.5 The need to maintain a continuing review of the ongoing environment monitoring programs in Esperance including sentinel monitoring program[s] to detect any further contamination, movement of existing contamination, and decreases in contamination in premises and the environment;
- 3.6 The engagement of and advice to the Esperance community throughout the cleanup and recovery project; and
- 3.7 The appropriate final signoff for the project.

4. MEMBERSHIP

- 4.1 The membership of the ECRP Steering Committee is made up of representatives appointed by each of the following organisations and agencies:
 - Locals for Esperance Development. – two representatives
 - Esperance Community
 - Esperance Chamber of Commerce and Industry
 - Shire of Esperance – two representatives including one elected councillor
 - Department of Health – two representatives
 - Department of Environment and Conservation
 - Department for Planning and Infrastructure – three representatives including the Director ECRP and the Co-ordinator Esperance Community Consultations, and
 - Landcorp.
- 4.2 The Committee is to be chaired by a Department for Planning and Infrastructure representative. The Chair on behalf of the Committee may invite other persons to attend a meeting of the Committee as considered appropriate for the matters under discussion.
- 4.3 The Department for Planning and Infrastructure will provide executive support and administrative services to the Committee.

5. RELATIONSHIP TO OTHER COMMITTEES

- 5.1 Esperance Interagency Committee (IAC) – The IAC was established to coordinate the response across Government Agencies to the lead [and nickel] contamination in Esperance and specifically to the recommendations of the Parliamentary Inquiry into the Cause and Extent of Lead Pollution in Esperance. The IAC has continued this coordinating role across Government Agencies in addressing the

various issues that have arisen following the contamination. As such the IAC has a complementary role to this Steering Committee.

- 5.2 A report on any matters relating to the town cleanup discussed at the IAC will be presented to the Steering Committee.

6. DECISION MAKING PROCESS

- 6.1 The Committee is to function as an advisory and reference group to the ECRP and to the Minister for Transport.
- 6.2. The Committee has no formal delegated authority in terms of either State or Local Government legislation. Government representatives operate within their agencies Delegation of Authority.
- 6.3 Decision making should where possible be unanimous.
- 6.4 The decisions of the Steering Committee will, as far as practicable, be implemented by the Project Team.

7. REPORTING

- 7.1 The Project Director will give detailed written reports on relevant and/or requested aspects of the Project to the Committee at each meeting
- 7.2 The Chairperson shall give overall progress reports in writing to the Ministers for Transport, Health and Environment and to the Premier and to the Esperance community.

8. FREQUENCY OF MEETINGS

- 8.1 Meetings shall be held approximately monthly or as agreed by the Committee.

9. AGENDA AND MINUTES

- 9.1 The agenda and supporting documentation will be distributed to members at least five working days prior to each meeting.
- 9.2 Minutes noting the topics discussed, and summarizing the decisions reached and key actions required will be distributed to members no later than one week after the meeting.
- 9.3 Minutes, as amended if required, shall be approved at the earliest possible Committee meeting. They are to be published at the earliest opportunity on the website of the ECRP.

Updated : 30 March 2009