



SIAM-2, C-4 Component  
Environmental, Risk and  
Resource Management

**SIAM-2 Codes of  
Environmental Practice**

Task: EM 3.1 COEP Review

March 2006

Prepared for  
**Ministry of Natural Resources, Environment and  
Meteorology**

by  
BECA International Consultants Ltd.

Report  
**Codes of Environmental Practice  
Review**

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By  
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March 2006

Ministry of Natural Resources, Environment and Meteorology  
Private Bag  
Apia  
SAMOA

30 March 2006

**Attention: Vitaua Peleiupu Fuatai**

Dear Sir

***Codes of Environmental Practice Review***

Please find enclosed the findings of our review of the Codes of Environmental Practice (COEP). This report is a deliverable of SIAM-2, C4.

Following receipt of this report, it is understood that you will convene a workshop of relevant parties to review the report and develop recommendations for revised and new COEP. A mechanism for approval/adoption of the COEP will then need to be discussed and agreed with MNREM and MWTL.

Yours faithfully  
Graeme Roberts  
Manager, Planning



on behalf of

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## 1. INTRODUCTION

In order to support the goals of the Infrastructure Asset Management Programme (IAMP) and to initiate sound environmental management practice procedures for public works, the Government of Samoa commissioned the preparation of Codes of Environmental Practice (COEP).

The intention was that the COEP be developed in two stages:

**Stage 1:** Interim codes to guide the implementation of works under IAMP.

**Stage 2:** A complete set of codes, referenced to legislation, to be prepared after a legislation review and consultation with stakeholders.

Beca prepared the stage 1, interim, COEP in 2000. These focused on road planning, design, construction and maintenance, along with associated protection works. The intention now is that stage 2 be implemented; where the COEP are reviewed and developed into a complete set of codes to cover routine physical work undertaken by other infrastructure providers such as Electric Power Corporation (EPC), SamoaTel and Samoa Water Authority (SWA).

## 2. PURPOSE

The purpose of this report is therefore to review the interim COEP to see if they are:

1. Appropriate for the Samoan environment
2. Being implemented by the approving authority
3. Being used by contractors and those doing the work
4. Providing practical solutions appropriate for Samoan work methods and resources
5. Providing adequate environmental protection for routine works
6. Reducing the amount of information that needs to be provided under the EIA process.
7. Covered by a formal memorandum of understanding between MNREM and MWTI.

Results from this investigation will be reported back to a workshop of relevant parties, with recommendations on how the existing COEP should be revised and new COEP that should be added. Draft revised/new COEP will then be prepared and circulated for comment before being finalised. A mechanism for approval/adoption of the COEP will also be discussed and agreed with MNREM and MWTI.

### 3. INTERIM COEP

The interim COEP set out minimum environmental standards that are to be met and appropriate procedures to be undertaken to reduce the environmental impact of various activities related to road works and services. Each of the phases of a roading project, i.e. planning, design, construction, and operation and maintenance are interrelated and have differing potential to effect (either adversely or beneficially) the environment.

The overall objective of the COEP is to provide a pollution prevention approach to general road works and services, establish guidelines for the mitigation of adverse environmental effects, and wherever possible indicate opportunities for environmental enhancement for, the planning, design, construction and operation and maintenance of roading projects.

It was intended that the development, approval, and subsequent adoption of the COEP in conjunction with the identification of project specific issues and the preparation of management and mitigation plans for those issues would allow a reduction in the dependence on the conventional environmental impact assessment (EIA) system. COEP are identified within the framework of environmental assessment outlined in Samoa's Draft EIA Regulations 1998.

The interim COEP that have been produced are:

1. Administrative Procedures
2. Planning, Design and Construction
3. Consultation
4. Land Acquisition and Compensation
5. Construction Camps
6. Erosion Control
7. Slope Stability
8. Quarry Development and Operation
9. Gravel Extraction
10. Coastal Protection
11. Drainage
12. Traffic Control During Construction.

It should be noted that COEP 3 & 4, in particular, require further development.

It was intended that proponents of routine works would follow the COEP recommendations for all phases of a project, not only during construction. COEP and their relevance to project phasing are summarised in Table 1.

*Table 1 – COEP and Relevance to Project Phasing*

<i>COEP</i>	<i>Phase of Project</i>			
	<i>Planning</i>	<i>Design</i>	<i>Construction</i>	<i>Operation and Maintenance</i>
1 Administrative Procedures	●	●	●	●
2 Planning, Design and Construction	●	●	●	
3 Consultation	●	●	●	
4 Land Acquisition and Compensation	●	●		
5 Construction Camps	●	●	●	
6 Erosion Control	●	●	●	●
7 Slope Stability	●	●		
8 Quarry Development and Operation	●	●	●	●
9 Gravel Extraction	●	●	●	●
10 Coastal Protection	●	●	●	●
11 Drainage	●	●	●	●
12 Traffic Control During Construction		●	●	●

As noted above, the COEP were developed primarily for road planning, design and construction. The COEP that are applicable to various roading activities are shown in Table 2.

*Table 2 – Road Works and Services Activities and Relevant COEP*

<i>Activity</i>	<i>COEP</i>											
	<i>1</i>	<i>2</i>	<i>3</i>	<i>4</i>	<i>5</i>	<i>6</i>	<i>7</i>	<i>8</i>	<i>9</i>	<i>10</i>	<i>11</i>	<i>12</i>
Stream or river crossings	●	●				●			●	●	●	
Removal of burial sites or graves	●	●	●	●								
Road realignment	●	●	●	●		●				●	●	●
Bush and vegetation clearance	●	●	●	●		●	●	●	●	●	●	
Land access for investigation and survey	●	●	●	●	●			●	●			
Land acquisition	●	●	●	●	●			●				

Culvert design	•	•				•					•	
Gravel extraction and borrow areas	•	•	•			•		•	•			
Batter stability	•	•				•	•					
Spoil disposal	•	•	•	•		•		•		•		
Road drainage	•	•				•				•	•	
Source of aggregates	•	•	•	•				•	•			
Disturbance of archaeological, heritage or cultural sites	•	•	•	•								
Establishment of workers' camp and facilities	•	•	•	•	•	•						
Blasting	•	•	•	•				•				•
Revegetation and landscape planting	•	•				•	•	•		•		
Visual impact	•	•			•	•	•	•		•		
Resettlement and or household relocation	•	•	•	•								
Bridge design	•	•				•					•	
Materials stockpiles	•	•				•	•	•	•	•	•	
Disturbance of wildlife and habitat	•	•			•			•	•	•		
Community/village contact and consultation	•	•	•	•				•	•			
Road operation	•					•						•
Routine maintenance	•	•	•			•						
Site (extraction and quarry) rehabilitation and reinstatement	•	•			•	•	•	•	•	•	•	
Erosion control	•	•			•	•		•	•	•	•	
Transport and storage of explosives	•	•						•				•

It can be seen that, while the COEP have been written specifically for roading activities, the activities that they cover are applicable to a wider range of works.

#### 4. ADOPTION OF INTERIM COEP

As part of the Coastal and Environmental Advisory Services (CEA) provided by Beca to the Government of Samoa under Phase 1 of this project, a series of training workshops were held during 2000 and 2001. Some of those workshops specifically addressed the issue of COEP and the adoption of these into the environmental impact assessment (EIA) system.

For example, a training session on 14 August 2001 was attended by officers of the then Public Works Department (PWD) and Department of Lands, Survey and Environment (DLSE). It was agreed at that workshop that COEP provide a practical means to avoid or mitigate adverse environmental effects and that COEP would be included in future contract specifications for routine work.

In order to implement the adoption of COEP into contract specifications, PWD reviewed the COEP and assigned priorities to each clause in the COEP; using a colour coding system:

**Green** – those clauses which could be immediately implemented

**Orange** – those clauses which could be implemented in 2 to 3 years

**Red** – those clauses which will not be able to be implemented.

At the conclusion of this workshop it was agreed that the COEP can serve a useful role in the EIA process and should be extended to include:

- Sand mining
- Reclamation
- Coastal works
- Building construction
- Beach nourishment

At a subsequent training workshop on 15 August 2001, the same officers agreed a list of work that would be eligible for a waiver from the formal EIA process. The ability for DLSE to give a waiver from the formal EIA process is specified in Part 1A - Informal Procedure of the draft EIA Regulations 1998. This section of the Regulations allows for preparation of guidelines for development proposals and/or environmental effects which are permissible without further reference to the Regulations. It was considered that the COEP would be one of the guidelines under Section 3A of the Regulations. Section 3C allows the Director of DLSE to issue a waiver from further formal EIA if he is satisfied that the proposed development will have no, or acceptable levels of, impact on the environment.

It was agreed that many of the routine maintenance works carried out by PWD would be eligible for a waiver from the formal EIA process. The agreed list was:

## **ROAD WORKS**

- Pothole patching
- Surface shape correction (asphalt premix)
- Grading gravel roads
- Re-sealing
- Mowing and clearing of overgrowth
- Reflectorised pavement marker installation and repair
- Road marking
- Rehabilitation of existing minor roads.

## **DRAINAGE WORKS**

- Clearing side drains
- Drain repair (open drains and culverts)
- Culvert construction
- Roadside drain construction

## **COASTAL PROTECTION WORKS**

- Routine maintenance of seawalls, groynes and revetments
- Rehabilitation of existing structures

## **BUILDING WORKS**

- Building maintenance
- Construction of small residential buildings

## **OTHER CIVIL WORKS**

- Footpath construction and maintenance
- Road sign installation and repair
- Guard rail installation and repair
- Levelling of sports fields
- Bridge upgrade, maintenance and repair
- Traffic signal installation and repair
- Reclamation (EIA required if structure on reclamation).

It was agreed at the training workshop that PWD would annually submit a list of these works to DLSE for blanket approval to proceed with the works under the relevant COEP. It was also agreed that PWD and DLSE would have regular meetings (at least annually) to review and monitor progress of works under the COEP system and recommend any improvements to the system before next year's programme commences.

The training workshops concluded by considering a draft Deed of Agreement, that had been prepared on 2 July 2001, for implementing the COEP. The wording of the draft was amended and updated to recognise and include various agreements which had been reached between PWD and DLSE during the training workshops. The agreements included:

- A list of standard consent conditions
- Standard clauses for contract documents
- List of works eligible for environmental waiver

These agreements were included as annexures to the Deed and a copy of the final draft (August 2001) is included in Appendix A.

In addition to training for PWD and DLSE, training workshops were also provided in 2001 for contractors, professional engineers and utility providers. All of these groups generally accepted the need for COEP and the ability to have waivers from the EIA process for smaller and routine works.

## **5. COEP IN THE SAMOAN ENVIRONMENT**

Although it is generally accepted that the COEP approach is appropriate for the Samoan environment, there has been comment that some wording in the interim codes requires a degree of environmental protection that may not be achieved in practice. This wording should be examined in the Stage 2 review of the COEP.

Other comments have been that even if the COEP conditions were achievable, they could result in a prohibitive cost to the Principal in terms of the contract. This is an important issue. There is little value in specifying strict environmental conditions if these cannot be achieved with available local resources or if the cost of compliance is so great it will jeopardise the future of a project. Examples of this can be seen in other countries where environmental legislation was seen to be effectively stalling development and legislative changes were subsequently required. It must be remembered that the COEP have been drafted for minor works and relatively straightforward environmental protection and cleanup. It is suggested that comments on costs and delays are aimed more at large projects proceeding through the full EIA process.

## 6. LEGISLATIVE CHANGES

Since the interim COEP were drafted in 2000, there have been several changes in legislation and government structure. For example, PWD is now the Ministry of Works, Transport and Infrastructure (MWTI) and the DLSE is now the Ministry of Natural Resources, Environment and Meteorology (MNREM). The Planning and Urban Management Act (2004) has established the Planning and Urban Management Agency (PUMA), which has relocated from MNREM to MWTI. The effects of these changes on the EIA process are outlined in the report SIAM-2 EIA Regulations, Beca November 2005. The report notes that options for progressing EIA regulations under the PUMA Act 2004 are presently being considered. It appears, that under the PUMA Act, PUMA can request an EIA as part of the development consent application process and make the assessment of the EIA one of the matters that are to be taken into account when determining an application. However, the PUMA Act does not provide a separate decision making process for EIA. EIA administrative and decision-making processes still remain with MNREM. While there is talk about transferring the EIA function to one agency, there is no obvious indication that this is likely in the short term.

In summary, on-going responsibility for developing, extending and promoting the COEP is far from clear. What is clear is that if a full set of workable COEP is to be developed, a mechanism for approval/adoption/implementation of the COEP will need to be discussed and agreed between MNREM, PUMA and MWTI.

## 7. COEP IMPLEMENTATION

Meetings were held with MNREM, PUMA and MWTI to assess whether the COEP are being implemented and, if so, the role that COEP are currently playing in the EIA process.

### 7.1 MNREM

MNREM still has EIA powers and functions under the Lands, Surveys and Environment Act 1989 and the draft EIA Regulations 1998. Under these pieces of legislation, MNREM can still require an applicant to carry out an EIA and has responsibility for facilitating and administering the EIA process. However, MNREM reported that in practice it is unable to administer the EIA process since its resources are now essentially limited to GIS, disaster management, forestry, parks and reserves, biodiversity, water resources and meteorology.

MNREM reported that it did not know about the existence of COEP or have a copy of the draft Deed of Agreement for the COEP. As a result of this the ministry is not implementing the codes. MNREM advised that it is no longer in a position to implement, or propose the use of, COEP since day-to-day environmental activities have been taken over by PUMA.

## **7.2 PUMA**

PUMA assesses environmental issues as part of the development consent application process under the PUMA Act. Development applications can range from public works (such as road and seawall construction and maintenance), to private works (such as residential building). PUMA uses the COEP as one criterion in assessing development applications. COEP are therefore continuing to be implemented by PUMA.

## **7.3 MWTI**

MWTI makes reference to COEP in its development consent applications for public works and includes COEP compliance requirements in its contract documents. Contractors' environmental management activities are monitored against the COEP. MWTI is therefore implementing the COEP in its public works programme.

## **8. USE OF COEP**

Discussions were held with relevant government ministries, departments and user groups to determine if COEP are currently being used. Comments from those discussions are summarised below.

### **8.1 MNREM**

MNREM receives requests from PUMA to comment on specific aspects of development consent applications. These requests are not directed to a specific manager in MNREM. PUMA requests information from whatever manager they consider appropriate. MNREM comments back to PUMA are on a one-off basis and do not refer to COEP or any other standard conditions.

In a meeting with MNREM, it was agreed that using existing COEP would assist them in co-ordinating its responses to PUMA. The meeting also identified several new COEP that would assist MNREM in defining its environmental responsibilities and in providing a more considered response on resource consent applications. These new COEP are:

- Biodiversity (both terrestrial and marine)
- CIM Plans
- Soil mapping/stability
- Hazard zones and land slips
- Heritage and archaeological sites
- Watersheds
- Economic evaluation of resources.

Although some of these may not be strictly COEP in terms of describing potential environmental effects and mitigation, they would still be useful in providing known information and give guidance on which works could be carried out under the COEP process and works that would require a full EIA.

MNREM also suggested that there needs to be clarification on how to weigh up the relative merits of economic benefit and environmental effects in a development application. This is a difficult subject, beyond the range of COEP. It would be more appropriately dealt with during the EIA Regulation review. The new COEP on economic evaluation of resources would provide a methodology for a high level evaluation that could be used as part of this process.

## **8.2 PUMA**

PUMA advised that, since the interim COEP were drafted in 2000, they have been relying heavily on them as consent conditions. COEP have been included as consent conditions on most development application approvals for public works and also, in many cases, they have been included as consent conditions for private works. PUMA noted that these are the only codes available in Samoa and they apply them wherever possible.

PUMA advised that the following COEP are those most frequently referred to in consent applications and the setting of environmental conditions:

- COEP 2 - Planning, Design and Construction
- COEP 6 – Erosion Control
- COEP 11 – Drainage.

The COEP on drainage is being regularly applied at present because of the recent problems with flooding.

In working with the interim COEP, PUMA have not identified any major issues or areas where the COEP need to be revised.

In addition to existing codes, PUMA considers that the following new COEP would assist in assessing and evaluating development applications:

- Parking areas
- Sanitation
- Landscaping and land contouring
- Wharves, jetties and boat ramps
- Sand mining
- Seawall and reclamation maintenance.

The question of having COEP for seawall and reclamation construction was discussed. It was agreed that the environmental issues usually associated with these types of construction are too complex to be dealt with using COEP and full EIAs would be required.

### **8.3 MWTI**

MWTI makes reference to COEP in most of its development consent applications for public works. COEP requirements are also included in nearly all of the contract documents that it prepares. Rather than single out specific COEP, contract documents usually require the works to be carried in accordance relevant COEP and that the contractor shall prepare an EMP as required under the COEP. MWTI has not noted any major issues while working with the interim COEP.

MWTI advised that they would like to see new COEP to cover the list of miscellaneous civil works that were noted as 'waivers' in the draft Deed of Agreement. These are:

- Footpath construction and maintenance
- Road sign installation and repair
- Guard rail installation and repair
- Levelling of sports fields
- Bridge upgrade, maintenance and repair
- Traffic signal installation and repair

These additional COEP would assist them in managing works contracts. MWTI would welcome the change from interim to 'adopted' codes since they believe that this would strengthen their contract documents.

### **8.4 CONTRACTORS**

Contractors are usually concerned about codes and regulations, since they see them costing money and time on projects. However, 5 of the main contracting companies in Apia generally agree that inclusion of COEP in contract documentation is desirable for small works, or works of a routine nature. Inclusion of COEP in contract documents gives the contractor some certainty when he is preparing his bid, since the extent of environmental works is better defined before the tender is priced and the contract signed.

The contractors noted one area of concern. This is that some COEP require the contractor to produce an Environment Management Plan (EMP) for the work. Contractors usually have difficulties in preparing EMPs. MWTI could assist with this by including an outline of the basis of an EMP in the works specification, including a list of potential environmental effects. This would give a guide to the contractor when selecting his works methodology and completing the EMP. The size of the EMP should be related to the extent or complexity of the work and, in many cases, may only be a single page statement on methodology and contingency plans. MWTI/PUMA could assist further by making simple or reference EMP templates available to contractors.

## 8.5 UTILITY PROVIDERS

Although utility providers, such as Electric Power Corporation (EPC), Samoa Water Authority (SWA) and SamoaTel have not been using the codes, they generally appreciate the need for COEP and the ability to get waivers from the full EIA process for smaller and routine works.

The providers are concerned about the present lack of co-ordination during installation and maintenance of utilities and referred to varying standards of reinstatement and clean up on completion of the work. It was suggested that the COEP be extended to clearly specify the level of road and footpath reinstatement that is required after utility trenches have been backfilled.

Utility providers also referred to the need for records of all underground services to be kept at one central location. They consider that this would minimise the risk of striking unexpected underground services during their work and the associated uncontrolled discharges and environmental effects. The need to research records to identify underground services before works commence should be referred to in the COEP.

## 9. PRACTICAL SOLUTIONS

Those currently using the COEP generally consider that the codes are providing practical solutions for environmental effects that may be encountered during minor works.

Users have, however, advised that there are some areas where the interim COEP need to be amended and updated. Examples of this are the conditions on distances from watercourses and conditions on refuelling. IT has been suggested that, instead of specifying actual distances in the COEP, it would be better to require the contractor to produce an Environmental Management Plan (EMP) to show how the environmental effects would be avoided or mitigated. Similarly for refuelling; rather than the COEP specifying specific conditions it may be better for the COEP to require the contractor to prepare a contingency plan for fuel and oil spills before the contract commences and have suitable containment and clean up equipment on site at all times.

However, there is a danger that if wording in the COEP is amended and made too general, then the COEP will lose their value as guideline documents for simple works. There is also the danger that if COEP are extended too far, by requiring EMPs for most activities, they may take over a role that is more appropriate for the full EIA process.

The review of the COEP in Stage 2 of this project should therefore have the aim of achieving a practical balance that would:

- Avoid or mitigate adverse environmental effects
- Be enforceable in terms of contract conditions
- Be achievable in terms of local resources

- Be at reasonable cost to the Principal.

## **10. ENVIRONMENTAL PROTECTION**

Current users of the COEP consider that they are generally providing adequate environmental protection for the routine works for which they were drafted. Code preparation is an on-going process. COEP need to be continually reviewed and updated as their effectiveness is judged through consent monitoring and the environmental performance of contractors.

## **11. COEP IN EIA PROCESS**

It appears that COEP are playing an important part in the overall EIA process. They are relatively simple to apply to small and routine works and are allowing approving authorities to put more time into evaluating larger development projects which are more likely to result in significant environmental effects.

It must be noted, however, that COEP were never intended to be environmental guidelines for the types of environmental effect that may occur on large development projects. There are potential problems if approving authorities use these codes for other than their intended purpose. For example, referring to COEP as consent requirements on major construction projects.

It must also be noted that COEP were developed for stand-alone works that are unlikely to have cumulative environmental effects. If there is any possibility that a proposed work could have a cumulative effect (such as reclamations, seawalls or groynes on a particular stretch of coastline), then COEP should not be used and the application should proceed through the full EIA process.

Limitations of COEP in the overall EIA process need to be recognised.

## **12. COEP STATUS**

PUMA reported that they believe the COEP Deed of Agreement (drafted between PWD and DLSE in August 2001) has now been signed. However, because of recent legislative changes, this agreement is now inoperable since it refers to parties that no longer exist.

If a formal working relationship for COEP is to be established between MNREM, PUMA and MWTI; then a new mechanism for COEP approval/adoption will need to be discussed and agreed. The resulting agreement (e.g. deed or memorandum of understanding) needs to clearly define responsibilities of the various parties to promote the COEP process under the new legislation. It would be preferable if the new COEP were formally adopted through the PUMA Act. PUMA and MNRE both agreed that the PUMA Act would be the appropriate mechanism for the COEP.

### 13. PROPOSED NEW COEP

During this review, several new COEP have been suggested. This is in addition to those that were suggested at the training sessions in 2001. The proposed list of new COEP is given in Table 3. Preliminary priorities have been assigned on a 1 to 3 basis, with 1 being the highest priority and 3 the lowest.

**Table 3**  
**Prioritisation of new COEP**

PROPOSED NEW COEP	PRIORITY
<b>COEP WORKSHOP 2001</b>	
Sand mining	1
Coastal works	3
<b>MNREM</b>	
Biodiversity	1
CIM Plans	3
Soil mapping/stability	2
Hazard zones and land slips	1
Heritage and archaeological sites	2
Watersheds	3
Economic evaluation of resources	1
<b>PUMA</b>	
Parking areas	2
Sanitation	1
Landscaping and land contouring	2
Wharves, jetties and boat ramps	3
Seawall and reclamation maintenance	1
<b>MWTI</b>	
Footpath construction and maintenance	1
Road sign installation and repair	2
Guard rail installation and repair	2
Levelling of sports fields	3
Bridge upgrade, maintenance and repair	1
Traffic signal installation and repair	2

These proposed new codes and their priorities will need to be reviewed and agreed at a workshop with relevant managers of MNREM, PUMA and MWTI before detailed drafting commences.

## **14. SUMMARY**

Results of this review are summarised as follows:

- 1) 12 interim COEP were drafted in 2000.
- 2) The COEP were adopted in a Deed of Agreement dated August 2001.
- 3) The Agreement allowed MPW to carry out routine or minor works under COEP with a waiver from the full EIA process.
- 4) It is generally accepted that the COEP approach is appropriate for the Samoan environment.
- 5) Interim COEP need to be reviewed and updated to take account of comments made by users.
- 6) Recent changes in legislation have made it unclear as to who is responsible for developing, extending and promoting the COEP.
- 7) With the introduction of the PUMA Act, MNREM now has a minor role in the COEP process.
- 8) PUMA and MWTI are implementing COEP.
- 9) PUMA is using COEP in development application assessments and consents.
- 10) MWTI is using COEP in its applications for public works and in contract documentation.
- 11) Contractors generally agree that inclusion of COEP requirements in contract documents is desirable.
- 12) Utility providers generally accept the need for COEP.
- 13) COEP are providing practical solutions for mitigating environmental effects and are filling a useful role in the full EIA process.
- 14) As a result of legislation changes, the interim COEP now have no formal status.

## 15. RECOMMENDATIONS

It is therefore recommended that:

- 1) A workshop is convened with relevant managers of MNREM, MWTI and PUMA to agree on which of the interim COEP need to be amended and the titles of new COEP that should be added.
- 2) Meetings are held with users of the COEP to agree in detail on the amendments that need to be made and to scope the contents of new COEP.
- 3) Interim COEP be amended and new COEP drafted.
- 4) Revised and new draft COEP be circulated for comment.
- 5) New COEP be finalised.
- 6) A series of workshops is held with COEP users in MNREM, MWTI and PUMA to introduce the new codes and to establish a 'COEP User Group' that can then regularly meet and suggest on-going amendments and updates that need to be made.
- 7) Following clarification of the EIA legislation, the new COEP be formally adopted under the PUMA Act.
- 8) Consideration is given to extending COEP to cover all works, both public and private.

Once these recommendations have been implemented, it would then be appropriate to proceed to Task: EM 4.1 Industry Training and Development.

Paul Wells-Green  
March 2006.