



Nhulunbuy Corporation Limited

Water Fluoridation in Nhulunbuy Consultation Report

February 2020

Executive summary

GHD Pty Ltd (GHD) was engaged by Nhulunbuy Corporation Pty Ltd to undertake community consultation in relation to the idea of adding fluoride to the town water supply to potentially improve dental health.

Consultation was undertaken during November 2019 through a range of mechanisms:

- Face-to-face meetings with key organisations in the community
- An information display held outside Gove Tackleworld
- An online survey on Nhulunbuy Corporation's website
- Social media posts on community Facebook sites.

In total, feedback received via the above tools was:

- 261 online surveys completed
- 11 people visited the information display
- 4 people either called or emailed Nhulunbuy Corporation directly
- 5 face-to-face meetings were held
- 5 organisations declined a meeting but offered to share information through their networks
- 1 organisation cancelled the meeting because they fully support fluoridation.

Additionally, a range of comments were received on the Facebook posts on Gove and Nhulunbuy Community Noticeboards.

Feedback indicates that **there is not strong support** for progressing fluoridation of Nhulunbuy's town water. Of 261 survey respondents, 58% oppose water fluoridation.

Face-to-face discussions through meetings and the information stall attracted mixed views on the topic, with a number of people unsure due to a lack of information.

Consultation indicated that the community has a number of questions in regards to water fluoridation and how it would be managed and implemented, if progressed. These questions largely focus on cost, maintenance, monitoring of fluoride levels and whether there are future plans to introduce water fluoridation beyond the Nhulunbuy township into surrounding remote communities.



Figure 1 GHD talking with the community in Nhulunbuy

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1. Introduction

1.1 Scope of work

GHD's scope of work for this project was to undertake community consultation in the town of Nhulunbuy, in line with the approved Engagement and Communication Plan.

1.2 Purpose of this report

This report provides a summary of consultation and recommendations for Nhulunbuy Corporation to consider if/when progressing this project. It details the level of engagement on the project and recurring themes from consultation.

1.3 Scope and limitations

This report has been prepared by GHD for Nhulunbuy Corporation Limited and may only be used and relied on by Nhulunbuy Corporation Limited for the purpose agreed between GHD and the Nhulunbuy Corporation Limited as set out in section 1.2 of this report.

GHD otherwise disclaims responsibility to any person other than Nhulunbuy Corporation Limited arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

The opinions, conclusions and any recommendations in this report are based on assumptions made by GHD described in this report (refer section 1.4 of this report). GHD disclaims liability arising from any of the assumptions being incorrect.

GHD has prepared this report on the basis of information provided by Nhulunbuy Corporation Limited and others who provided information to GHD (including Government authorities), which GHD has not independently verified or checked beyond the agreed scope of work. GHD does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

1.4 Assumptions

The following assumptions were made in regards to consultation for this project:

- Consultation was limited by a budget defined by Nhulunbuy Corporation
- Face-to-face meetings were scheduled based on availability of key personnel in nominated stakeholder organisations. GHD experienced some difficulty in confirming appointments as it appeared many Nhulunbuy residents/employees were not in town in the week that consultation was scheduled (or in the planning stage). Three meetings were also cancelled on the day they were scheduled to take place
- Naturally occurring fluoride levels for Nhulunbuy's town water supply were not available for discussion during consultation
- Analysis of the online survey results was undertaken by Nhulunbuy Corporation, with guidance from GHD.

2. Background

Nhulunbuy's town water supply is managed by Nhulunbuy Corporation Limited and Rio Tinto, through the Nhulunbuy Town Board, and the water supply to surrounding communities is managed by Power and Water Corporation. The population of Nhulunbuy township is 3240 people, as at the 2016 Census.

The town of Nhulunbuy has not had fluoridated drinking water since 2011/2012. The Nhulunbuy Corporation and Town Board engaged GHD in October 2019 to seek input from the community as to whether they support the reinstatement of fluoridation of town drinking water. The reinstatement of fluoridation to the town's water supply was prompted by a letter from the East Arnhem Health Clinic and Public Health Advisory Group to Power and Water Corporation (received in February 2019). The letter outlines the health reasons for fluoridating Nhulunbuy water and urges Power and Water Corporation to consider fluoridation of all communities with a population of 600 people or more.

This letter is in line with the Department of Health Position Statement on the use of Fluorides in the Northern Territory (November 2010).

Anecdotally, we understand that Rio Tinto's current view is that Nhulunbuy drinking water meets Australian and world standards of water quality as it is however, they are willing to fluoridate the water if there is broad community support for the change.

The fluoridation of drinking water in the Northern Territory is controlled by the Dental Act Schedule 3, 1999.

3. Engagement process

In order to seek input from the Nhulunbuy community on water fluoridation, GHD developed an Engagement and Communication Plan which aimed to:

- Raise awareness of Nhulunbuy Corporation's consideration of fluoridation of the town water supply in Nhulunbuy
- Inform the community that consultation is taking place on 13 and 14 November 2019 in Nhulunbuy, undertaken by an independent consultant, GHD
- Provide factual information on the topic of water fluoridation to the Nhulunbuy community
- Seek feedback and input from the community on the issue of water fluoridation; identify key areas of concern or gaps in information and to gauge overall sentiment on the issue.

The engagement process was supported by a range of communication material including:

- A radio announcement promoting the information stall, advertised locally
- Frequently Asked Questions relating to the consultation process
- Frequently Asked Questions from the Department of Health on water fluoridation
- A Fact Sheet on water fluoridation
- A statement from the National Medical Health Research Centre regarding water fluoridation.

All material was made available on the Nhulunbuy Corporation's website at: www.ncl.net.au.

3.1 Face to face meetings

GHD undertook five face-to-face meetings over 13 and 14 November 2019 in Nhulunbuy and Darwin. Organisations to meet with were selected from a community list provided by Nhulunbuy Corporation and with the intention of gaining input from a broad spectrum of organisations. Many of the organisations GHD contacted were not available in the week GHD visited Nhulunbuy and some meetings were cancelled on the day. The five meetings were with:

- Rirratjingu Aboriginal Corporation who represent the local Traditional Owners
- Gumatj Aboriginal Corporation
- Department of the Chief Minister and Department of Health (combined meeting)
- The National Indigenous Australians Agency (NIAA)
- Miwatj Aboriginal Health Corporation (as representatives of the East Arnhem Health Advisory Group).

Within the meetings GHD outlined the consultation process, Nhulunbuy Corporation's intent to gauge community sentiment and asked a series of questions.

3.2 Information display

To enable community members to provide input in an informal environment, GHD managed an information stall outside Gove Tackleworld on Thursday 14 November 2019 between 10 am and 2 pm. This location was recommended by Nhulunbuy Corporation as a high pedestrian traffic area (given it is beside Woolworths and the main street). During this period 11 people stopped to speak with us and an equivalent number took a Fact Sheet as they passed by.

3.3 Online survey

Nhulunbuy Corporation managed an online survey which was open for just over two weeks and closed on 25 November 2019. During this period, 261 submissions were received.

3.4 Social media

During the consultation period, information was posted on both the Gove and Nhulunbuy Community Noticeboard Facebook sites, promoting the information stall and the survey and encouraging residents to have input. During the consultation period many comments were received on the posts however, given that many of them were negative in nature, the site administrators turned off the comment function so these were unable to be counted.

3.5 Phone calls and email submissions

In addition to the advertised consultation mechanisms, some residents chose to directly email or call Nhulunbuy Corporation during the consultation period. Feedback received in this way has been considered in the summary of feedback below.

4. Community feedback

4.1 Sentiment/key themes

In conversations GHD held with community members and key organisations, the sentiment was mixed as to whether they support or oppose water fluoridation. A number were unsure, based on a lack of information or knowledge. Some stakeholders were strong supporters (particularly if they worked in the medical profession or had family members who do so). Others were adamantly opposed based on a perception that there's no need for it or a concern about either health impacts or cost. Out of the 11 people who stopped to talk with GHD at the information display, three people opposed fluoridation, two supported fluoridation and the remainder were unsure based on a lack of information.

Generally speaking, in the five meetings GHD undertook, stakeholders were happy to leave the decision 'in the hands of the experts' and open to the introduction of water fluoridation if they had further factual information.

Some people had a perception that the introduction of water fluoridation is a 'done deal' and consultation was not genuine.

Some residents expressed a concern that Rio Tinto will hand back the water fluoridation plant at a cost to the town when their lease expires.

4.2 Further information/concerns

Consultation raised a number of concerns or requests for further information in relation to fluoridating the town water supply. These varied but focused on:

- How the water fluoridation would be funded ongoing and beyond the lease currently held by Rio Tinto
- Concerns that rates will go up as a result of the introduction of water fluoridation
- What the naturally occurring levels of fluoride are in Nhulunbuy's water supply
- Why fluoridation was stopped back in 2011/12
- The risk of over-fluoridation and individuals suffering adverse health effects as a result
- A desire to understand where the fluoride comes from
- Who will monitor fluoridation levels if it's introduced and whether they would be appropriately qualified.

5. Consultation outcomes

The online survey was the most popular mechanism for residents to provide feedback. Respondents accessed the survey through both a link on Facebook and the website. Of 261 responses, 202 accessed the survey via the Facebook link and 59 directly through the website.

A summary of key results is included below:

5.1 Statistical relevance of the sample

Based on a town based population of 3240 (2016 Census) and a sample size of 261 respondents the survey results are statistically relevant for the definitive question on whether they support the idea of fluoridating Nhulunbuy's water supply.

Applying a 99% confidence level with the sample size of 261 a confidence interval of 7 is achieved.

This would mean that had all the residents in Nhulunbuy responded to the survey there would be 99% confidence that between 51% to 65% of respondents would have indicated they do not support the idea of fluoridating Nhulunbuy's water supply. If all residents in Nhulunbuy responded there is 99% confidence that between 27.1% to 41.1% of respondents do support the idea.

5.2 Water consumption

Respondents were asked how much tap water they consume on a daily basis. Of 259 respondents to this question, 71% said that they drink between one and four litres of tap water per day.

5.3 Knowledge of Nhulunbuy water

One of the key survey questions asked respondents whether they were aware that fluoride is not currently added to Nhulunbuy's town water. Of 261 respondents, 223 said that yes they were aware, representing 85% of respondents.

5.4 Benefits of fluoridation

Respondents were asked whether they thought it would be beneficial to add fluoride to the town water and if so, why. Of 261 respondents;

71 (27%) said that 'yes' they thought there would be benefits and these were primarily listed as dental health benefits – preventing decay and improving young people's health.

156 (60%) people responded 'no' and listed concerns around adding chemicals to the water, perceived adverse health impacts and not seeing a need.

Some respondents 34 (13%) were unsure and provided comments such as:

- If we've been drinking the water up until now, why do we need to add fluoride now?
- There are other ways of combatting poor dental hygiene than adding fluoride to the water
- Our water already has naturally occurring fluoride
- There are arguments for and against and I'm not sure which to believe
- We have the best water in the world so why mess with it?

5.5 Concerns

Respondents were asked whether they had concerns around the idea of fluoridating Nhulunbuy's water and what they were. Of the 249 people who answered this question, the majority said they did have concerns, primarily based on:

- Perceived negative health impacts and chemicals being added to the water (79)
- Expectations that the taste and smell of the water would change (31)
- Uncertainty around ongoing management of the dosing levels, process and responsibilities (11)
- A belief that the water is already good quality and fluoridation is not required

5.6 Further information

Of the 261 respondents, 180 said they would like further information on water fluoridation. When asked to identify how they prefer to receive information, 45% said through an information stall at the Endeavour Centre, 41% said via website and the other responses were split between email and printed material.

5.7 Support for water fluoridation

Of 261 survey respondents, 150 people said they don't support fluoridation, 89 responded yes, 15 were unsure and 7 had no opinion. This equates to 58% of respondents opposing water fluoridation, 34% supporting water fluoridation and 8% either unsure or had no opinion.

Q5 Do you support the idea of fluoridating Nhulunbuy's drinking water?

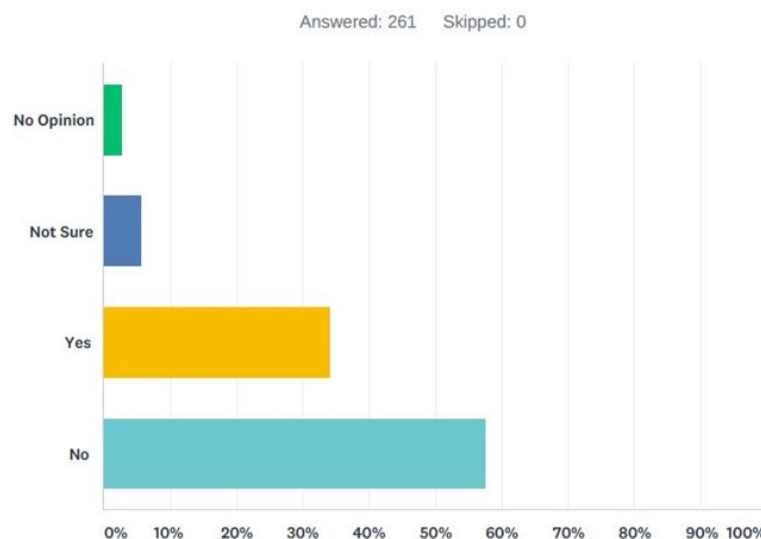


Figure 2 Survey responses for support of fluoridation

6. Discussion

The community feedback received at the information display, via social media, through meetings and via the survey indicate that there a strong and mixed views on fluoridation of Nhulunbuy's water supply from the community.

This sentiment is representative of the community response whenever the practice of water fluoridation is proposed as described in the papers Working with Communities to extend water fluoridation: A Victorian Case Study and Mandatory Fluoridation - Huff, Puff and Blow (attached as Appendix A). These studies found that the communities views can be influenced by philosophical views, public interest in water issues and misunderstandings around the water treatment process.

Of the concerns raised, the key areas for the Nhulunbuy respondents seems to be perceived negative health impacts, the addition of chemicals to the water supply, the management of dosing and the perceived need for fluoridation.

The ability to address these concerns is limited by the difficulty in changing the philosophical views of the community members. However the areas of concern could be reduced though a range of options as described in Table 1.

Table 1 Summary basis of key concerns and options to address

Area of concern	Assumed basis of concern	Option to address
Perceived need for fluoridation	Philosophical view Availability of information (oral health data, water quality data)	Provide baseline data on oral health for Nhulunbuy town residents to identify if there is a problem Provide water quality data on current natural fluoride levels in town drinking water
Perceived negative health impacts	Philosophical view Availability of information (understanding of impacts)	Information and education program
Addition of chemicals to the water supply	Philosophical view Availability of information (dosing requirements)	Determine dosing regime in consultation with Power and Water Corporation, Department of Health and process engineers
Management of dosing	Historical management Quality assurance	Determine an operational approach to gain public's trust in capacity and ongoing resourcing commitments to manage the plant

7. Recommendations

7.1 Overall sentiment

Based on the input received from the online survey, which was the main source of community input, there is not support for fluoridation of Nhulunbuy's town water.

Whilst many people are aware of reports of dental health benefits, for some of them, there was too much uncertainty (lack of information) for them to commit to supporting fluoridation. In addition to this there are strong philosophical views that drive concerns around fluoridation.

If Nhulunbuy Corporation chooses to progress water fluoridation for Nhulunbuy either now or in the future, GHD recommends that a comprehensive education and communication campaign is undertaken including information on:

- Current data on dental health in the region, compared to other locations in the NT and Australia
- Health benefits and risks (including independent research reports)
- The naturally occurring levels of fluoride in Nhulunbuy's town water, with comparisons to other NT and Australian locations
- The potential sources of fluoride
- Long-term planning regarding management responsibilities, costs, dosage levels and ongoing monitoring
- Coordination and support from Power and Water Corporation to align planning, responsibilities, dosage levels, costs and ongoing monitoring
- Commentary around whether there is a broader plan to introduce fluoridation to communities in the region outside of Nhulunbuy, noting that this sits with Power and Water Corporation (but provides an opportunity for Nhulunbuy Corporation to start the conversation on community's behalf).

7.2 Consultation follow up

To close out the consultation loop, GHD recommends that Nhulunbuy Corporation undertake the following actions to communicate the outcomes of this process to the broader community:

- Email the organisations GHD met with to thank them for their input and provide a summary of the final outcome
- Post a story on the Nhulunbuy Corporation website including this report's Executive Summary
- Post a story on the Gove and Nhulunbuy Facebook sites directing people to the website story for more information and confirming the final decision
- Provide advice to the East Arnhem Public Health Advisory Group informing them of the consultation outcomes.

Draft messaging has been provided at Appendix C, prepared based on the assumption that Nhulunbuy Corporation will not proceed with fluoridation based on this consultation process (to be confirmed by Nhulunbuy Corporation).

Appendices

Appendix A – Meeting notes



Minutes

29 November 2019

Project	Water fluoridation in Nhulunbuy	From	Heather North
Subject	Consultation Meetings Minutes	Tel	+61 8 8982 0138
Venue/Date/Time	Various	Job No	12516708
Attendees	Cassandra Buckley (GHD) Heather North (GHD)		

MEETING – Juliette Mundy - Miwatj Health Aboriginal Corporation (4/11/19)

- CFAGroup established the Oral Health Working Group and also have a MOU with the Uni of Melbourne who have dental health students complete remoted placements in communities in East Arnhem. The group meets quarterly.
- Oral health was identified as a big issue in a forum held in Nhulunbuy in 2017 which is what has led to this project
- The CFAGroup have a 10 year plan for oral health in Indigenous communities in which fluoridation is a main goal
- Miwatj see the fluoridation of Nhulunbuy's water supply as a step in the right direction to make fluoridated water accessible to all people in East Arnhem
- Juliette has the understanding that central land areas have higher levels of naturally occurring fluoride and their oral health is vastly better. She mentioned East Arnhem oral health is in dire condition.
- Juliette's recommendations:
 - Emphasise WHO endorsement of fluoride (presenting their facts may be beneficial in informing people)
 - Find out where exactly (what communities) Nhulunbuy's town water supply reaches (try to find the regional map)
 - Also contact the government dentist, regional council, childcare centres and sports facilities/pool for a consult, or visit to distribute information and survey

MEETING – Jaylene Chevalier – National Indigenous Australians (13/11/19)

Other attendees: Matthew Chalk, William Paparo (east Arnhem Engagement Team)

- Not aware the water is not currently fluoridated
- Matthew: Science suggests it's safe and beneficial for oral health
- Very bad dental issue in East Arnhem and they are pro fluoridation for that reason

- Suggestion made that appropriate training be conducted for technicians and staff who are implementing the fluoridation at the point of initial infrastructure and fluoride
- They wanted to know when it would be implemented and the timeframes surrounding the proposal if it was to go ahead
- Suggestion made by Matt: Information (Fact sheet and FAQs) be translated in Yolgnu as well as having an interpreter present at the info stand. The proportion of Indigenous residents in Nhulunbuy will support this
- Pro-fluoridation but would also like to be more informed
- Suggestion from Jaylene: Contact the School Council (made up of parents)
- Suggestion from William: Research outcomes from Weipa fluoridation about 5 years ago

MEETING – Hayden –Community Services Manager - Rirratjingu Aboriginal Council (13/11/19)

Other attendees: John (CEO)

- No stance on for/against fluoridation but are advocates of high quality consultation and information for the community
- The reasonable concerns of the community should be properly noted and taken into account
- John and Hayden are going to ask their Directors on the 14/11/19 about the proposal (not giving out surveys) and will report back on any interesting feedback (strong pro/anti)
- Rio Tinto obligated to upgrade infrastructure (negotiations still happening as to the extent of upgrades) at the end of their tenure
- Facebook exposure so far on the campaign has worked better than the website
- Stated general surprise at the water not currently being fluoridated

MEETING – Donna – Department of the Chief Minister (13/11/19)

Other attendees: Nicky (Director, Oral Health, Top End Health Service)

- Confirmed that it was infrastructure that was the reason the fluoridation regime ceased in 2012 and that the community were not kept well informed
- NTG have shown fluoridation is best practice, so they generally felt that consultation is not necessary – it should be a given that it is re-implemented
- Donna questioned: What will be the ongoing costs following the \$80-150K costs of initial implementation
- Nicky mentioned she was part of the CFAG/Miwatj/Melbourne Uni alliance who came up with the oral health plan
- Donna stated concern that the community won't realise the survey is their only chance to have their say until it's too late
- Gove and Nhulunbuy noticeboards on FB are important outlet
- Donna concerns: Toxic levels of fluoride (fluoridosis) how do we know when we are getting too much?
- Why aren't neighbouring communities being consulted with about implementing fluoridation?

- Concerned that Nhulunbuy Corp. is not bringing in PWC about implementing fluoride in neighbouring communities
- Question: Are they intending to share results of this consult with PWC?
- If there is no clear answer at the end of the process they should consider what they originally had fluoridated water for

MEETING – Klaus – CEO, Gumatj Aboriginal Corporation (14/11/19)

- Klaus said the first questions he would ask is:
 - Why isn't the water fluoridated anymore?
 - Who made the decision to stop and for what reason/s?
 - Will it be explained to the public why it was discontinued initially? He believes Nhulunbuy will need justification around these questions as context to this proposal to reintroduce
- He believes there was concern around the management and control of the quantity of fluoride added (lack of control)
- He believes the infrastructure is off-lease and therefore would be interested to know who will manage it and how
- Water that goes to Nhulunbuy is initially tested by PWC because the supply comes from off-lease and runs past communities (supplying them on the way) but Nhulunbuy tests are done separately – Rio Tinto does this? Where is this data?
- PWC's influence (being NTG) would mean that if they decided to fluoridate the water outside of Nhulunbuy where they have jurisdiction then it would happen without consultation and despite any public concerns
- Klaus believes that the communities would not have an opinion – because most of them reside out of town
- He proposed that he could put it to his board that the "Dept. health recommends fluoride be added to the water for health reasons and they think it will be good for the community" and get back to us with any strong feedback – but he believes they won't have an opinion
- He would like to see that the management and controls, if fluoride is implemented, be up to the standard of that supplied and delivered by PWC throughout the rest of the country
- Klaus suggests asking Alicia from Rio Tinto about details of the fluoridation shutdown in 2012 – what were the reasons, who made decision, who will be in charge of the re-implementation and how will they manage it so that there isn't a repeat of 2012?
- Klaus had a major concern that there will be a perception of "why aren't the communities getting fluoride? Are they different to the town?" He believes there needs to be transparency and justification around these questions to satisfy the community going forward

Appendix B – Survey and meeting questions

Survey questions

Nhulunbuy Corporation is considering the idea of fluoridating Nhulunbuy's drinking water. However, before we make a decision, we'd like to find out more about whether the community supports the idea.

To help us reach a decision, we'd appreciate you completing this short survey. You can remain anonymous or provide contact details (particularly if you'd like to receive more information). We have engaged local consultants GHD to help us consult with the Nhulunbuy community about water fluoridation. On 13 and 14 November 2019, the GHD team will be in Nhulunbuy meeting with a number of organisations. They will also hold an information display at the Woolworths Shopping Centre between 10 am and 2 pm on Thursday 14 November 2019. You are welcome to go along and chat to the team, ask questions and provide your thoughts on water fluoridation.

1. How much tap water do you drink each day?

- None, I drink filtered or bottled water
- Less than 1 L
- Between 1-4 L
- Greater than 4 L

2. Do you know that currently fluoride is not added to Nhulunbuy's water supply?

- Yes
- No

3. Do you think it would be beneficial to have access to fluoridated water? If so, why?

4. Do you have any concerns about the idea of fluoridating Nhulunbuy's drinking water? If so, what are they?

5. Do you support the idea of fluoridating Nhulunbuy's drinking water?

- Yes
- No
- Not sure
- No opinion

6. Would you like more information on water fluoridation? If so, how would you prefer to receive it:

- Email
- Website
- Printed
- Information stand at Endeavour Centre

Stakeholder meeting questions

Are you aware that currently fluoride isn't added to Nhulunbuy's water (but is for Darwin and Katherine's water supply)?

Do you think it would be beneficial to add fluoride to the town water supply?

Do you have any concerns around adding fluoride to the water?

Would you like to receive more information about water fluoridation? (Refer to website) Any specific areas of interest?

Generally speaking, do you support the idea of introducing fluoride to Nhulunbuy's water supply?

Appendix C – Draft communication messaging

The draft messaging below has been prepared for Nhulunbuy Corporation on the basis that the results of consultation will mean they are not progressing with water fluoridation. If the final decision is different, messaging can be amended.

Website update

Water Fluoridation Consultation Update

During November 2019, GHD Pty Ltd, undertook consultation on behalf of Nhulunbuy Corporation and the Town Board to seek input from the community on fluoridating the town's water supply.

Consultation has now concluded. Overall, there was not strong support for fluoridating the water.

An Executive Summary of the consultation process is attached for information.

As a result of this process, Nhulunbuy Corporation will not be proceeding with water fluoridation at this point in time.

We thank everyone for their input to the consultation process.

Social media post

Did you recently provide input on fluoridation of Nhulunbuy's town water?

Consultation has now concluded and based on community input, Nhulunbuy Corporation will not be proceeding with fluoridation. A summary of the consultation process can be viewed on our website at www.ncl.net.au

We thank you for your input.

Email to stakeholder organisations

Consultation on Nhulunbuy Water Fluoridation

You may have recently provided input to a consultation process to determine whether we should fluoridate Nhulunbuy's town water. The process has now concluded and based on community feedback, we will not be proceeding with fluoridation of the town water.

An Executive Summary of the consultation report is available on our website at: www.ncl.net.au

Thank you to everyone who provided input.

GHD

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Document Status

Revision	Author	Reviewer		Approved for Issue		
		Name	Signature	Name	Signature	Date
0	C.Buckley	N.Fries		N.Fries		29.11.2019
1	C Buckley	N Fries		N Fries		05.02.2020

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