

Mr Anthony Amis, Friends of the Earth Australia

(1) Given that Australia is lagging behind the US and EU in banning PFAS, what specific regulatory changes should be introduced in NSW?

Trade Waste Agreements need to be investigated and audited. Regulations pertaining to Commercial Trade Wastewater and Liquid Trade Waste Management Guidelines need to be overhauled or at least updated to include specifications about eliminating PFAS from waste streams. PFAS releases into sewers and storm water need to be a priority for investigation.

The EPA in NSW needs to be adequately funded to pinpoint where the major PFAS pollution sites are located, this should include sites where biosolids/sewage waste has been applied to land. This would mean that water authorities and the EPA and other government agencies (eg Forestry Corporation, NSW Resources (mines)) would also be included in investigations.

Recycled water needs to be tested particularly in relation to plans where recycled water from Quakers Hill Water Resource Recovery Facility will be piped to Prospect Hill Reservoir.

<https://www.sydneywater.com.au/content/dam/sydneywater/documents/quakers-hill-wrrf-advanced-treatment-upgrade-and-prw-scheme.pdf>

Audits of transfer stations and landfills where runoff enters sewers and stormwater also need to be investigated. The waste/recycling industry should also be a priority.

The burden on the waste-water industry and sewerage system from PFAS needs to be minimised.

Investigations should also prioritise: Mist suppressants used in the electroplating industry (particularly chrome electroplating), manufacturers of composite wood and orientated strand board, building insulation (particularly concrete panels and blocks), paints and varnishes, wire and cable industry, grease-proofing agents in food contact materials, semiconductor industry, textile and furniture industry (particularly furniture and carpeting, auto industry, aerospace industry, hospitals (particularly hospital waste streams), medicine and pharmaceutical industry, pesticides, solar panel storage facilities.

City West Water in Melbourne is a good example of how PFAS can be monitored. Samples are taken at various locations, where manholes are located. Analysis then is carried out to determine which areas/suburbs are releasing the largest PFAS amounts into sewers.

There also needs to be testing for fluoroacetic acid throughout NSW,

All investigations should be followed up by regulatory action including stopping the source of the pollution and creating a fine system if PFAS releases continue.

Europe regulations

<https://echa.europa.eu/hot-topics/perfluoroalkyl-chemicals-pfas>

The EU and Australia are signatories to the Stockholm Convention. But the convention only covers PFOS, PFHxS and PFOA.

Long Chain perfluorinated carboxylic acids (C9-21 PFCAs) are being considered under Stockholm Convention.

Perfluorinated carboxylic acids (C9-21 PFCAs) have been restricted in the EU since February 2023. Eg PFOA. Perfluorinated carboxylic acids include (TFA, PFPrA, PFBA, PFPeA, PFHxA, PFHpA, PFOA, PFNA, PFDA, PFUnDA, PFDoDA, PFTTrDA, PFTTeDA)

New South Wales should immediately act to restrict perfluorinated carboxylic acids and investigate short-chain PFAS chemicals and their role in waterway pollution throughout NSW.

(2) Should the NSW Government compensate communities affected by PFAS contamination?

Yes, particularly if drinking water is impacted. Blood tests should also be provided by State Government in worst impacted areas.

Further studies need to be determined to assess % of PFAS loads contributing to cholesterol loads. More work can be done in this space. It is complicated because the highest PFAS loads can be in homes. One of the major conduits for PFAS is probably in food, particularly from non-stick pans and fast-food wrappers. House dust and fumes are also major contributors.

(3) What legal or financial penalties should apply to industries found responsible for ongoing PFAS pollution?

Large fines need to apply particularly in regards to industries where releases of PFAS contaminated liquids into sewer systems and stormwater.

Perhaps any of these companies operating in NSW need specific attention.

<https://chemsec.org/reports/the-top-12-pfas-producers-in-the-world-and-the-staggering-societal-costs-of-pfas-pollution/>

(4) Has Friends of the Earth identified any gaps in public awareness campaigns regarding PFAS risks?

Major gaps include risks in the home and volatilisation of PFAS chemicals in home environments. These problems can occur within homes and also in residences near PFAS areas and also homes located in areas with polluted groundwater.

There needs to be public education campaign throughout NSW about PFAS uses in industrial and domestic settings. (eg cosmetics, car washing and waxes, disposal of paints (eg releasing paint down drains), ski waxes etc)

Regulatory bans on PFAS cooking implements, eg non-stick cookware need to be created.

There also needs to be a strategy where PFAS items can be removed from households, collected by the NSW Government and stored/destroyed.

Investigations into best means of getting rid of PFAS laden materials should also be a priority.