

**INQUIRY INTO INQUIRY INTO PFAS CONTAMINATION
IN WATERWAYS AND DRINKING WATER SUPPLIES
THROUGHOUT NEW SOUTH WALES**

Organisation: Central NSW Joint Organisation
Date Received: 27 November 2024

Partially
Confidential

Inquiry into PFAS contamination in waterways and drinking water supplies throughout New South Wales

27 November 2024



**CENTRAL NSW
JOINT ORGANISATION**

- Bathurst
- Blayney
- Cabonne
- Cowra
- Forbes
- Lachlan
- Lithgow
- Oberon
- Orange
- Parkes
- Weddin

27 November 2024

Alex Stedman
Director
NSW Legislative Council's Select Committee on PFAS Contamination
Parliament House, Macquarie Street
Sydney NSW 2000

Via email: pfas@parliament.nsw.gov.au

Dear Director,

Re: Inquiry into PFAS contamination in waterways and drinking water supplies throughout New South Wales

Central NSW Joint Organisation speaks with a unified voice for its collective priorities. This region has a proud history of working collaboratively, representing over 180,000 people covering an area of more than 53,000sq kms comprising the local government areas of its membership - Bathurst, Blayney, Cabonne, Cowra, Forbes, Lachlan, Lithgow, Oberon, Orange, Parkes, Weddin.

Tasked with intergovernmental cooperation, leadership and prioritisation, CNSWJO has consulted with its stakeholders to identify key strategic regional priorities. The CNSWJO Strategic Plan can be found here - www.centraljo.nsw.gov.au.

Thank you for the opportunity to provide feedback to the Select Committee's Inquiry into PFAS (per and polyfluoroalkyl substances) contamination in waterways and drinking water supplies throughout New South Wales.

The delivery of safe compliance-based drinking water to Central NSW communities is of the highest priority to the CNSWJO Board. To this end, CNSWJO member councils with responsibility for drinking water management, all subscribe to a performance and benchmarking program that includes audits of drinking water management systems as part of their membership of the CNSWJO's collaborative Water Utilities Alliance.

This region takes its commitment to the supply of quality drinking water to its communities very seriously. Councils routinely monitor and test their water to ensure that their water supply meets the Australian Drinking Water Guidelines in line with stringent NSW Health Guidelines.

In 2023 the Alliance assisted with the development of the NSW Health Drinking Water Management System Independent Audit Guidelines piloting their application in regional NSW. Our members are now among the first Local Water Utilities in the State to undertake external audit readiness reviews and audits with external drinking water management specialists.

The CNSWJO understands that the intention of this inquiry is to examine issues including:

- the adequacy and extent of monitoring and data collection on PFAS levels in waterways and drinking water sources. (terms of reference a)
- the adequacy of the reporting and disclosure requirements to the public of monitoring and findings on PFAS contamination of water (terms of reference b)
the health, environmental, social, cultural and economic impacts of PFAS (terms of reference f)
- public sector resourcing and coordination amongst relevant agencies in preventing, controlling and managing the risks of PFAS to human health and the environment (terms of reference j)
- international best practices for water treatment and filtration, and the environmentally sound management and safe disposal of PFAS. (terms of reference k).

The CNSWJO works closely with the NSW Water Directorate which also represents our member council's water utilities. We broadly support the Directorate's submission which addresses the more detailed terms of reference and seek to highlight some of the key points in our response below.

The adequacy and extent of monitoring and data collection on PFAS levels in waterways and drinking water sources

Where the advice from NSW Health is that the *utility should assess risks, and if necessary, test for indicator organisms, pathogens, cyanobacteria, pesticides, disinfection byproducts, other organic compounds and radiological contamination*¹ and from EPA that utilities should ensure that they have assessed the risk to drinking water from PFAS, and include this in their drinking water management system, CNSWJO LWUs have welcomed NSW Health's support for initial LWU PFAS screening.

Sampling and analysis of PFAS can be costly and difficult for regional LWUs already under pressure from water security and quality issues arising from climate change, ever increasing regulatory requirements and costs as well as challenges associated with ageing infrastructure and infrastructure damaged by successive natural disasters. These are already impacting the affordability of water and sewerage systems in regional communities, especially those with a small rate base.

There is no doubt that ongoing support will be needed for regional NSW for any new monitoring regime based on the costs, quality assurance and resource requirements for testing. Utilities also need assistance in understanding test results and are looking to NSW Health to assist with this analysis.

The adequacy of the reporting and disclosure requirements to the public of monitoring and findings on PFAS contamination of water.

It is noted that NSW Health has recommended public reporting of drinking water monitoring results and have provided a template for sharing routine monitoring. This is helpful though needs to be amended by LWUs to be more customer focused.

While the reporting and disclosure of water quality monitoring is currently not mandatory for local water utilities many of our utilities are posting their results on their council's websites to build transparency and trust with their communities around PFAS monitoring and the results from this.

It must be noted, however, that many small less well-resourced regional councils do not have the capacity to be updating data on websites monthly.

¹ NSW Health website: Water Utilities, accessed 1 November 2024. Available at: <https://www.health.nsw.gov.au/environment/water/Pages/water-utilities.aspx>

We anticipate that an ongoing testing regime will confirm that water supplies are safe, however, the public will need education and assurance that this is the case. In this respect the recommendation of NSW Health for local water utilities to publicly report drinking water quality data and performance is supported. A dashboard that summarises monthly test results in a format that is easily accessible by the public would be the ideal.

The health, environmental, social, cultural and economic impacts of PFAS

With growing community awareness of the PFAS problem, the CNSWJO has welcomed the decision by national health authorities to review Australia's drinking water standards. Clearly there is a need to examine the science and compare what other countries are doing.

There's a growing community understanding that PFAS is an 'everywhere chemical'. While not made in Australia, the chemicals have been used in industrial and consumer products such as firefighting foams, pesticides, fertilisers, carpets, non-stick cookware, cosmetics, sunscreens, waterproof clothing and other everyday products.

PFAS chemicals are not added to drinking water but can be present in water at very low concentrations due to contamination from various external sources in the environment.

Unfortunately, we are unable to fully identify and quantify impacts on drinking water across regional NSW without a further public facing investigation by the responsible regulating agencies in NSW targeted at investigating and mitigating drinking water impacts. However, our understanding is that the most likely treatment technology mix would involve activated carbon treatment, followed by incineration of the activated carbon media from time to time. There are approximately 380 town water supply systems across regional NSW. Very few systems are known have activated carbon filtration. Upgrading drinking water treatment systems could cost hundreds of millions of dollars, but stress that we don't know the extent of the problem.²

public sector resourcing and coordination amongst relevant agencies in preventing, controlling and managing the risks of PFAS to human health and the environment

The CNSWJO supports comments by the Water Directorate that NSW Health's Water Unit has the regulatory power and skillset to coordinate monitoring and reporting of PFAS contamination, provided that the NSW government commits further resources and funding to investigate. NSW DCCEEW currently has the regulatory powers and capacity for overseeing investment in water infrastructure across regional NSW. It is important that these two agencies are appropriately funded and resourced.

Where there is already billions of dollars of investment needed in infrastructure to address water security, water quality and environmental risks, it is critical to have a balanced view of all of the risks facing regional and metropolitan water utilities. It isn't possible to reduce any risk to zero.

The NSW local government sector and their local water utilities do not have the resources to control and manage the PFAS risk. Significant funding and coordination will be required by the responsible NSW government agencies to support local water utilities.

We agree with the Water Services Association of Australia (WSAA) where they state that controlling PFAS at the source and preventing it from entering water sources is generally lower cost, less energy

² NSW Water Directorate submission – November 2024
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intensive and more effective than implementing treatment technology to remove PFAS from drinking water.³ While we should be concerned about PFAS in drinking water, there are numerous significant exposure pathways for PFAS that should be addressed.

Conclusion

Thank you for the opportunity to provide feedback to this inquiry. Where the PFAS issue is not a new one, or one of our making, the CNSWJO and its member council's LWU will be looking to the relevant State and Federal Government agencies and our peak industry associations, Water Services Association of Australia, the Australian Water Association and others to represent our interests as we all grapple with understanding the science around PFAS and the responses to this. If you require further information or clarification on comments in this submission, please do not hesitate to contact

on .

Yours sincerely,

Executive Officer

Central NSW Joint Organisation (CNSWJO)

³ <https://wsaa.asn.au/Web/News-and-Resources/Resources/Per--and-Poly-Fluoroalkyl-Substances--PFAS--Fact-Sheet.aspx>