Submission No 25

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

Organisation: Riverina Water County Council

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Submission on per- and polyfluoroalkyl substances (PFAS) contamination in waterways and drinking water supplies throughout NSW.

Firstly, thank you for the opportunity for Riverina Water County Council (RWCC) to provide a submission to the committee. RWCC is a NSW local government water utility (LWU) responsible for providing safe, reliable and cost effective drinking water to a population of around 77,000 throughout four local government areas – Wagga Wagga, Lockhart Shire and parts of Greater Hume and Federation Councils. RWCC's submission is to support the committee's examination of PFAS related issues and will provide feedback on the items within the terms of reference where we can add value based on our experiences.

RWCC is collaborating with government agencies to address PFAS contamination from the RAAF Base at Forest Hill and engaging with key organisations like the NSW Water Directorate and the Water Services Association of Australia. Since 2017, the Department of Defence, alongside NSW EPA, NSW DCEEW, NSW Health, Wagga Wagga City Council, and Goldenfields Water County Council, has monitored PFAS contamination from the Forest Hill RAAF Base, which poses a significant risk to RWCC's East Wagga supply bores. This PFAS contamination has high potential for RWCC's East Wagga supply bores to be impacted soon by PFAS. This partnership approach has demonstrated that PFAS management is complex, resource intensive and requires a proactive multi-agency approach to effectively manage PFAS contamination at any stage where it can be influenced. Recent detection of PFAS at RWCC's West Wagga bore field and at an independent village ground water source serving Tarcutta township, further adds complexity to coordinated response of responsible agencies and organisations.

Monitoring of PFAS

Under the Australian Drinking Water Guidelines (ADWG) framework, RWCC conducts risk-based source water monitoring to evaluate water quality risks. Since 2017, proactive PFAS testing has focused on areas near high-risk industries, as PFAS, a synthetic chemical, is not naturally occurring. Monitoring frequency is determined by the likelihood of contamination and of course, the results of such sampling.

RWCC doesn't manage water supply catchments and water resources (i.e. storage dams) and operates with water entitlement licenses issued by the State as with other water users e.g. irrigators. However, it works very closely and provides strong advocacy to those agencies and regulators that do have roles in the catchment's health and its

sustainability. Therefore, PFAS monitoring and data collection across waterways and drinking water sources should be coordinated to assist government agencies and regulators in reviewing the effectiveness of existing program in protecting public health, especially considering revised NHMRC PFAS limits. Further access to PFAS monitoring data would assist broader licenced water users beyond LWU and allow government agencies and regulators to work together to establish the most appropriate course of action.

The emerging PFAS issue is becoming more prevalent in the communities due to lower thresholds of detection in water testing analysis, in response to NHMRC's proposed drinking water guidelines limits, that are significantly less that current ADWG limits. Water supplies and sources that were previously considered as having 'non-detectable PFAS concentrations' are now being identified as having 'detectable PFAS' concentrations. The burden of communication to concerned communities regarding PFAS monitoring and reporting is being directed to local water utilities such as Riverina Water.

Impact of PFAS regulatory reform

While RWCC support the draft ADWG on PFAS in drinking water by the NHMRC, the PFAS health values are far more stringent than existing values. Due to the nature of PFAS and its widespread use beyond firefighting foams, it's critical that PFAS contamination is managed collectively to best deliver sustainable and cost-effective solutions for protecting both human health and the environment.

The draft ADWG PFAS limits may unintentionally place significant responsibility on local LWUs to manage PFAS contamination in affected source waters, despite having limited control over preventing such contamination. While LWUs are committed to providing safe drinking water, identifying sources of low-level PFAS contamination is complex and often beyond their jurisdiction. This highlights a potential gap in the framework, as effective PFAS management requires a coordinated, transparent approach across government agencies to influence outcomes throughout the chemical's life cycle, prioritising prevention over treatment at the local level. This is further complicated by private users and state and local government organisations reluctant to openly/transparently conduct PFAS sampling and monitoring as a strategy to avoid dealing with emerging PFAS issue in the community.

Implementing the draft ADWG limits requires a regulatory impact statement to assess current impacts and cost-effective strategies for achieving PFAS levels to protect public health. Reviewing and adapting management frameworks should focus on meeting draft health standards effectively and affordably. Key areas that would assist are:

- Broader PFAS monitoring of source water to identify impacted drinking water sources statewide.
- Accessible PFAS monitoring data for agencies and water licence holders to support informed decision-making.
- Establish a consistent, collaborative framework for agencies to proactively investigate and manage contamination sources above safe PFAS health levels.
- Implement a prioritised strategy to allocate resources to the most critical community and environmental impacts.

Proactive source water testing within RWCC's supply area has detected very low, intermittent PFAS levels in only a few systems. However, under the proposed more stringent ADWG PFAS limits, even these low-level detections could have a similar impact as larger contamination, leading to uncertainty around responsibility for source investigation or how the PFAS impacts to broader water licence holders are managed. These detections could impose significant costs, including the development of new sources—without guaranteeing PFAS-free water—or the implementation of expensive treatment technologies with substantial ongoing operational expenses and impact the water security of communities if sources are taken offline. These detections highlight existing PFAS frameworks and strategies require adaptation to further protect our source waters from PFAS contamination, while understand control options at a local level such as blending source water or exploring treatment technologies.

Recent regulator engagement indicated that users of affected water sources are responsible to ensure that their supplies are 'safe to drink' at their cost, when they could be considered 'victims' of the overall PFAS contamination in the environment. To address this issue effectively, PFAS regulatory reform must prioritise proactive responses from state and federal agencies, offering both support and solutions for those dealing with PFAS contamination.

Community engagement

Proactive community engagement regarding PFAS contamination in water is crucial for maintaining public trust and ensuring transparency in how individual situations are being managed. Access to clear and consistent information for all water users is important to alleviate fear and help understand context, such as ADWG PFAS limits being based over a lifetime of exposure. Clear, consistent and accessible communication is essential to help the public understand any potential risks and ongoing efforts to protect their safety.

An identified gap regarding community engagement and consultation are those water users not supplied by local water utilities e.g. operating their own private water supply schemes. It is currently unclear between state agencies of who is responsible to ensure communities consume safe drinking water or use of water for food production.

Coordination amongst relevant agencies in preventing, controlling and managing the risks of PFAS

Effective PFAS management requires a coordinated, holistic approach across government agencies across the three tiers of government, with clear roles, transparent governance, and practical application at all levels. Any identification of PFAS source water contamination should enact inter-agency support and the implementation of appropriate solutions, relieving the burden from impacted communities and local stakeholders.

RWCC would like to thank the committee for its inquiry to help improve PFAS management and is happy to further assist. Please direct further requests to Melissa Vincent at .

Yours sincerely,

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