

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

Organisation: Goulburn Mulwaree Council
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Goulburn Mulwaree Council
Locked Bag 22
Goulburn NSW 2580

Civic Centre

www.goulburn.nsw.gov.au

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Contact:

Reference: 2009498

The Director, Alex Stedman
Parliament House
Macquarie St Sydney NSW 2000
pfas@parliament.nsw.gov.au

Subject: Submission – Select Committee on PFAS Contamination in Waterways and Drinking Water Supplies Throughout New South Wales

Thank you for the opportunity to provide a submission to the Select Committee on PFAS Contamination in Waterways and Drinking Water Supplies Throughout New South Wales.

Council provides water and sewer services to the city of Goulburn and the Marulan township. Goulburn services an equivalent population of around 28,000, while Marulan is smaller with an equivalent population of around 1000. Council recently completed testing for PFAS through the testing regime funded by NSW Health and found that both water supplies had PFAS results below the existing, and proposed, limits for PFOA, PFOS, PFHxS and PFBS.

Council welcomes a review into PFAS contamination in waterways, however it should be acknowledged that removing PFAS from products used everyday is the first step to reducing PFAS concentrations in the environment. This will reduce the need to potentially treat PFAS found in Drinking Water Supplies.

Council supports the Select Committee's Terms of Reference, and has additional feedback on some of the Terms:

- f) the health, environmental, social, cultural and economic impacts of PFAS

The focus has been on the presence of PFAS rather than its removal or treatment. It should also be noted that removal and treatment of PFS has other implications, including:

- Allocating resources to this new issue and diverting them away from other critical operational activities such as renewal of key infrastructure
- Removal of PFAS from other products, such as wastewater and biosolids
- Disposal of PFAS once removed by treatment.
- Cost implications to Councils, including capital upgrades, funding ongoing treatment and changes in testing and monitoring regimes due to changing requirements.

A holistic approach to dealing with PFAS is required, to ensure that Councils do not allocate resources and attention away from key operational works.

- h) the structure, capacity, capability and resourcing of New South Wales Government agencies and water utilities to detect, monitor, report on, respond to and mitigate against PFAS contamination of water supplies, including the adequacy of infrastructure and resources

The NSW Government needs to be resourced for this emerging issue as Council's do not have the expertise of resources to manage PFAS contamination.

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

NSW Government coordination of PFAS will be required to address PFAS contamination in waterways and drinking water supplies. At present, NSW EPA are completing their investigations into contaminated sites across the state, with NSW Health providing funding for initial screening of PFAS and corresponding guidance on the management if detected. For the successful management of PFAS, where found, Councils will need to be guided by state authorities, both through informing water utilities of the issues and solutions, as well as providing guidance and funding for continued monitoring and the addressing of any issues found.

- m) areas for reform, including legislative, regulatory, public health and other policy measures to prevent, control and manage the risks of PFAS in water supplies

This is welcomed however it should be noted that this should include legislating the use of products and materials containing PFAS. Although these contaminants can be removed through treatment, it is much easier and less expensive if these contaminants were not present in the first place, and the concentration of these contaminants did not continue to increase. A ban on these chemicals in all new products and materials will ensure that concentrations do not continue to increase that would reduce the amount of PFAS in the environment.

PFAS is a by-product of a number of everyday products that are used extensively. Any movement towards imposing requirements on water utilities to remove PFAS from drinking water, wastewater and any bi-products of these treatment processes is unaffordable for Council's. For Goulburn Mulwaree Council alone, the upgrade of Council's water and sewer treatment plants to treat for PFAS would be cost prohibitive without additional external funding. As such, it would be expected that if Councils had to introduce new treatment processes in the future to eliminate PFAS, an external funding source would need to be provided to assist Council with these upgrades.

Thank you for the opportunity to make this submission. Council will be keen to further participate in following stages of this review to explore solutions to the management of PFAS within waterways and drinking water supplies.

Yours faithfully

Director Utilities