Submission No 32

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

Organisation: Long Water Agricultural Association

Date Received: 27 November 2024

Select Committee on PFAS Contamination in Waterways and Drinking Water Supplies Throughout New South Wales

Attn: Ms Cate Faehrmann MLC

Committee Chair

27th Nov 2024

Subject: Woodlawn Advanced Energy Recovery Centre (ARC) - Concerns of PFAS in flu gas, bottom ash and water runoff during the Waste from Energy Process.

The Long Water Agricultural Association would like to draw your attention to concerns we have arounds Veolia's treatment of PFAS during the operation of the proposed Woodlawn ARC.

Long Water Agricultural Association was formed in Dec 2022 to represent local and regional citizens, residents and landowners whose properties are subject to potential impacts from the high temperature waste incineration facility proposed by Veolia at its Woodlawn site. The Association is very broadly based and represents 57 agricultural enterprises within a 40 kilometre radius of the proposed development, comprising a total of 63 966 hectares valued at approximately $700 million - between $4500 -$5000 an acre. Our member's farming activities involve:

- 220,547 sheep
- 21,206 cattle
- 20,000 chickens
- 5,000 bales of wool
- 7,247 hectares of crop
- and approximately143 employees.

The Association was formed to represent the interests of our members, their families, their livelihoods and their employees. All members of the Association strongly object to the high temperature waste incineration proposal.

In August 2023 Veolia agreed to a meeting with Long Water Ag, in discussions related to measuring PFAS the Veolia representatives indicated that PFAS could only be tested from bottom ash and there were no recognised testing procedures for monitoring PFAS from the flu ash. They also indicated the high temperature of the furnace (850*C) would break down PFAS from its current state to one that would render it harmless.

In a recent article found by our group published in 2023 by Environmental Science and Technology Emission on "per- and polyfluoroalkyl substances (PFAS) from a waste to energy plant - occurrences in ashes, treated process water and first observation in flue

gas by BJorklund et al(2023)" (see attached). In this article they state "our results demonstrate that some PFASs are not fully degraded by the high temperatures during WtE conversion and can be emitted from the plant via ash, gypsum, treated process water and flue gas. The article also states that larger amounts of PFAs can also be leached from the waste stockpile prior to entering the incinerator. The authors acknowledge this is the first time they believe it has been done using EN 1948-1 sampling protocol and needs more validation, however we believe this is something Veolia should be looking at rather than declaring it can't be done and not pursuing it just because the EPA does not require it.

It is well known that PFAS are a group of nearly 15,000 synthetic chemicals that are present in numerous household and industrial products including; stain and water protection for carpets, fabric, furniture and apparel, paper coating (including for some food packaging), metal plating, photographic materials, aviation firefighting foam, cosmetics, sunscreen, medical masks and devices, insulation and building material and nonstick cooking utensils. Many of these materials will be present in the waste feedstock being used to fuel the ARC.

It is also well known that PFAS does not breakdown in a timely manner, it is found in soil and water which leads to a bioaccumulation in our bodies via the food chain. Epidemiological studies have revealed associations between exposure to specific PFAS and a variety of health effects, including altered immune and thyroid function, liver disease, lipid and insulin dysregulation, kidney disease, adverse reproductive and developmental outcomes, and cancer.

The Associations concerns for our community are that the Woodlawn ARC will become a concentrated depositary for PFAS for all of Sydney's industrial and domestic waste over an extended period. The Association has been very clear about our concerns of the affects this facility will have not only of our food production but for the health of nearby residents surrounding the ARC, this concern has now been heightened with the knowledge the process does not break down PFAS and that our region will become the dumping ground for PFAS and other toxins via flu ash, bottom ash and water runoff. This concern should also be one that is shared by all Govt entities given the serious nature and the potential to affects the wider population.

Veolia also has a legislative duty of care under the Work Health and Safety ACT to protect its employees who will no doubt bear the brunt of these contaminants. The Hierarchy of Controls used to reduce the risk in high-risk environments such as this state that Elimination is the best control. We cannot see any way that Veolia can eliminate PFAS from any of its feedstock given the numerous products containing PFAS. The attached article clearly proves that PFAS is a commonly known contaminant in the Waste to Energy process and does not break down but in fact becomes concentrated on that site.

Given the potential implications for public health, environmental sustainability, and agricultural viability, it is deeply concerning that the NSW EPA Policy Statement 2021

does not include specific provisions or guidelines for PFAS testing requirements, particularly in the context of WtE processes.

Furthermore, Veolia's assertion that there is no PFAS testing requirement under the NSW EPA Policy Statement 2021 raises additional concerns about regulatory oversight and accountability.

In light of these concerns on the 22nd April 2024 the Long Water Agricultural Association wrote to the EPA to request clarification from the NSW EPA regarding the following:

1. The reasons behind the absence of a written policy for PFAS testing requirements under the NSW EPA Policy Statement 2021, specifically with regard to WtE processes.
2. Any plans or initiatives to address this gap and establish clear guidelines for PFAS testing in WtE processes under the NSW EPA Policy Statement 2021.
3. A commitment to table this information for discussion with relevant government departments responsible for ensuring the safety of affected residents, livestock, and the general public.

On the 29th Oct 2024 Long Water Ag Association and two other Tarago based organisations (Tapai and Communities Against The Tarago Incinerator) met with HPHI & the EPA. The group discussed leachate and potential runoff into the Syd Catchment, lack of compliance with current regulations, odour issues with current operation, contamination of ground water, PFAS baseline testing and future monitoring of flu gas and leaching of PFAS form feedstock and the affects these will have our rural community.

We believe that addressing these concerns is essential to ensure the protection of public health, environmental integrity, and the long-term sustainability of our communities.

We appreciate your attention to this matter and look forward to your response. Thank you for considering our concerns.

Sincerely,

The Long Water Agriculture Association