

# The Senate Select Committee On PFAS

(Per and Polyfluoroalkyl Substances)

<b>Date</b>	<b>8/11/2024</b>
<b>Briefing Type</b>	<b>Submission</b>
<b>Priority</b>	<b>High</b>
<b>Subject</b>	<b>FRV PFAS Mitigation Initiatives</b>
<b>Key Contact</b>	<b>Assistant Chief Fire Officer Mick Tisbury</b>
<b>Attachment/s</b>	<b>1.</b>
<b>RECOMMENDATION/S</b>	
That the Select Committee on PFAS recommends:	
<ol style="list-style-type: none"><li>1. That the Government stop kicking this can down the road, please stop with the never-ending inquiries, expert panels and bureaucratic processes and start implementing enforceable, practical and realistic legislation and solutions.</li><li>2. That the Australian Government ratify the United Nations Stockholm Convention resolutions that numerous Federal Government representatives have agreed and voted on.</li><li>3. That the Australian Federal Government implement a ban on the use of any PFAS containing firefighting foam, inclusive of B Class foam extinguishers in Australia.</li><li>4. That the Australian Federal Government commence litigation against 3M for the harm caused to Australian firefighters, the public, and the environment for knowingly producing, falsely marketing and selling of these harmful products for decades.</li></ol>	

## **BACKGROUND:**

1. I am Assistant Chief Fire Officer Michael Tisbury AFSM, currently responsible for FRV's PFAS Project Team.
2. I joined the Metropolitan Fire Brigade (MFB) Melbourne, now Fire Rescue Victoria in 1989 and have more than 35 years as an operational firefighter, training instructor and senior fire officer. I have led the development of training performance standards and a safety culture within the training environment; initiated research into PFAS exposure for firefighters which led to the development of Operational PFAS Threshold Limits and best practice PFAS decontamination processes for firefighting appliances and equipment.
3. I developed, co-authored and commissioned the world first PFAS Blood Reduction Study of Firefighters in collaboration with Macquarie University, which has been published in the Journal of the American Medical Association (JAMA), proving successful treatment to significantly reduce PFAS levels via plasma and blood donations.
4. My team and I are currently developing techniques in PFAS Remediation of FRV Fire Stations and adjoining properties as well as advocating and sharing our successful PFAS Mitigation Strategies both nationally and internationally.
5. For transparency, I was formerly the Vice President of the United Firefighters' Union Victoria Branch and the current UFU of Aust PFAS Representative as well as an Assistant Chief Fire Officer Fire Rescue Victoria
6. My qualifications and awards include:  
  
Advanced Diploma of Public Safety (Firefighting Management); MFB Executive Officer Commendation; Australian National Service Medal; MFB Long Service and Good Conduct Medal; National Emergency Medal for 2009 Black Saturday bushfires in Victoria; Australian Fire Services Medal (AFSM) 2019, MFB Board Citation of Service 2020; National Emergency Medal 2019/20 Black Summer Bushfires; Recipient of both the Victorian Premier's Sustainability Award and the National Banksia Award for PFAS Initiatives and was a Victorian Finalist: Australian of the Year 2024.
7. Since 2017 I have represented professional firefighters from Australia, New Zealand, the United States of America, Canada and the United Kingdom as part of the Global Alliance of Firefighter Unions at the United Nations Stockholm Convention and the POPRC.

8. FRV (Fire Rescue Victoria) recognises that Per & Polyfluoroalkyl Substances (PFAS) is a key organisational risk and strategic priority and endorses the precautionary-principal approach based on the increasing significant body of evidence demonstrating PFAS having adverse effects on both health and the environment.
9. Firefighters, being occupationally exposed to PFAS via Aqueous Film Forming Foam (AFFF) fluorinated B Class firefighting foam and have legacy PFAS contamination above average PFAS levels in their blood. All fire services in Australia used this foam concentrate (3M lite-water) based on 3M's advise that it was safe and biodegradable.
10. FRV (formerly MFB) discontinued using 3M lite-water in 2007 and transitioned to PFAS Free B Class Foam concentrate in 2010-14.

### **ISSUES / RISKS / OPPORTUNITIES:**

11. In 2000, the Australian National Industrial Chemicals Notification and Assessment Scheme (NICNAS) had commenced issuing yearly bulletins requesting inventory lists from fire services, major chemical hazard facilities and end users of firefighting foam of 3M's decision to stop the production of 3M lite water, based on some emerging health and environmental risks.
12. Both government and industry have been aware of this for 24 years and yet there is no nationally consistent legislation stopping the use of PFAS Foam in Australia. This is despite the Australian Government being signatories to the UN Stockholm Convention and consistently advocating and voting for the elimination and banning of the use of PFOA, PFOS and PFHxS. The International Agency for Research on Cancer have listed PFOA as a Category 1 Carcinogen and PFOS as a Category 2 Carcinogen.
13. Due to the lack of meaningful legislative action of both Federal and State Governments over decades, FRV have been forced to implement Policies and Procedures to protect not only our firefighters, but also the public and environment. Unfortunately, the PFAS Mitigation Initiatives and achievements the FRV PFAS team have implemented have been despite our respective governments and regulators as opposed to with their assistance. This is similar for fire services across the country, especially in dealing with state Environmental Protection Authorities.
14. Environmental regulators need to support organisations in dealing with PFAS contamination and allow the trial of new treatments and solutions, to prove both their effectiveness and to add to the National toolbox of remediation strategies. Every PFAS mitigation strategy FRV have implemented has been not only measurable and successful, but prior to implementation, the 'experts' have said our goals were impossible to achieve. The fire appliance decontamination process, the PFAS blood reduction treatment, and the fire station remediation processes focussing

on immobilisation, were all deemed impossible, until we did them. Never tell firefighters that something is impossible, because that's what we do every day.

15. PFAS firefighting foams are still being legally used in Australia therefore concentrating on remediation of known legacy contamination, whilst allowing the continued use of these products is a self-defeating exercise. fire stations, firefighting training area, airports and defence force bases have been well documented to be contaminated with PFAS, however Major Hazard Facilities and Industrial areas across the country are also heavily contaminated due the ongoing use and testing of PFAS containing foams in fire protection systems.
16. Vested interests masquerading as "independent experts" have repeatedly lobbied governments both nationally and internationally to allow the continued use of PFAS foams. These lobbyists (generally funded by manufactures of PFAS containing foam concentrates or industries), deny any adverse health or environmental impacts caused by PFAS and state that PFAS Free foam concentrates do not extinguish B Class fires effectively.
17. Nobody cares more about firefighter safety than firefighters do. We are the ones on the end of a hose line during an emergency, we are the ones supporting each other when we get occupationally related diseases, and we are the ones who attend each other's funerals. Never have I see a politician, a regulator, an "independent expert" or a chemical industry salesperson attend our funerals; it's just firefighters and their families burying their own.
18. Firefighting is a dangerous occupation that results in many unavoidable exposures to toxins and carcinogens. PFAS exposure from firefighting foam is 100% avoidable and completely unnecessary.
19. FRV have spent millions of dollars in the development of our PFAS Mitigation Strategies and will continue to expend substantial financial sums in the remediation of fire stations and adjoining private properties where required. FRV believes in the polluter pays principle and will continue to remediate where required, however the cost of this remediation should not continually be the taxpayers. The real polluters here are the multi-national chemical companies who knowingly sold these products as being harmless and 100% biodegradable that need to be held to account, both financially and morally.
20. Lessons learnt by FRV during our PFAS journey in NEVER trust manufacturers. 3M sold their Lite-Water Foam as being biodegradable, it wasn't, it was a 'forever chemical'. Angus sold their Tridol as being PFOA free, it wasn't, it contained PFOA. PFAS was only found in B Class foam concentrate, never in A Class foam. FRV recently tested our A Class High Expansion Foam stocks purchased from Chubb Fire and Security. All samples tested positive for PFAS.
21. Addressing both legacy and continued PFAS contamination will be both expensive and time consuming. PFAS is now found across the world and elimination of these forever chemicals will be challenging if not impossible.

Immobilisation, removing or reducing the exposure pathways will be key to reducing the risks associated with repeated PFAS exposures.

22. Solutions currently exist to reduce the exposure pathways and reduce harm caused by legacy PFAS contamination; however, I have not seen 1 product that can address all sites and exposure pathways. FRV's successes have been utilising many different techniques, products and solutions depending on the site conditions, receptors, soil types and extent and concentration of contamination.
23. Any threshold established by legislators and regulators needs to be fact based, enforceable and achievable otherwise it is meaningless, including updates to the NEMP and to Australian Drinking Water Guidelines.

### **RECOMMENDATION:**

24. This is one of numerous state and federal submissions and testimonies I have given relating to PFAS and I keep making the same request. Please stop kicking this can down the road, please stop with the never-ending inquiries, expert panels and bureaucratic processes and start implementing enforceable, practical and realistic legislation and solutions.
25. That the Australian Government ratify the United Nations Stockholm Convention resolutions that numerous Federal Government representatives have agreed and voted on.
26. Implement a ban on the use of any PFAS containing firefighting foam, inclusive of B Class foam extinguishers in Australia.
27. Commence litigation against 3M for the harm caused to firefighters, Australians, fauna, flora and the environment for knowingly producing, falsely marketing and selling of these harmful products for decades.

This submission is an overview of Fire Rescue Victoria's experiences when it comes to PFAS. I would be please to expand further or provide additional information if the Senate Select Committee on PFAS so wishes.

**Michael Tisbury**  
**Assistant Chief Fire Officer**  
**Advocacy and PFAS Project**  
**8<sup>th</sup> November 2024**