



06/11/2024

**Response to:**

**Senate Select Committee on PFAS (Per- and Polyfluoroalkyl Substances)**

Dear Committee Members,

Thank you for providing the opportunity to submit inputs on the Senate Select Committee's inquiry on the regulation and management of PFAS contamination in Australia. Below, I address several key points relevant to the terms of reference, focusing on areas of need for improved regulation, precautionary measures, public health considerations, and best practices in PFAS management.

**1. Inclusion of Unregulated PFAS in Reporting and Monitoring**

PFAS constitute a group of chemicals known for their toxicity, persistence, and bioaccumulative properties within the food chain, with growing evidence of contamination in water, soil, and other natural resources. Despite national and international efforts to regulate PFAS, these efforts are often limited by competing interests and an incomplete understanding of the full range of PFAS compounds. While current reports in Australia and globally focus on the five PFAS compounds regulated by the United States Environmental Protection Agency (US EPA), many other PFAS compounds remain unregulated and under-researched. Examples include all short chain PFAS, trifluoroacetic acid (TFA, drinking water), perfluorobutanoic acid (PFBA, widely detected in fresh water) and ammonium 4,8-dioxa-3H-perfluorononanoate (Adona), among others. Given the diversity of PFAS chemicals and the incomplete research on their potential toxicity, we strongly recommend that thorough toxicological testing be conducted before any new PFAS compounds are approved for production, distribution, or use in Australia.

In addition, the definition of PFAS in regulatory frameworks is not consistent, and we advocate for adopting the strictest possible definitions to minimize the risk of harmful exposure. Caution should be exercised in permitting any PFAS-related substances, as the potential environmental and public health costs of managing PFAS contamination may outweigh the societal benefits offered by chemical manufacturers.

Recent policy updates underscore the need for responsive and proactive regulation as our understanding of PFAS evolves. For example:

- In the United States, Minnesota will implement the strictest PFAS ban nationwide starting January 1, 2025, requiring that 11 categories of consumer products sold or distributed in the state be PFAS-free. [Minnesota Pollution Control Agency](#)
- In the European Union, the European Commission has committed to revising the REACH regulation with a proposal expected by 2025. [ChemTrust](#)

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We also suggest expanding water quality and environmental monitoring to include unregulated PFAS compounds. This would provide a more comprehensive understanding of potential exposure and environmental impacts. Waiting for regulatory frameworks to catch up on these additional PFAS compounds may delay protective actions, leaving communities vulnerable to unaddressed risks.

## 2. Government Funding to Facilitate PFAS Management Programs

A targeted government funding program for PFAS management would support state and local authorities in effectively addressing contamination. Although the ARC and NHMRC issued a targeted call for PFAS remediation research in 2018, continuous government funding support for PFAS-specific research remains essential.

Programs similar to North Carolina's initiatives (<https://www.deq.nc.gov/about/divisions/water-infrastructure/emerging-contaminants-pfas-funding#EmergingContaminantsPFASFundingExamplefromNorthCarolina-14545>, <https://collaboratory.unc.edu/news/2024/04/02/north-carolina-expands-pfas-research-capacity-through-collaboratorys-3-million-investment/>) in the United States could offer a model for Australia, where dedicated funding has facilitated environmental testing, community health assessments, and advancements in remediation technologies. However, it is crucial for Australia to establish its own PFAS research and regulatory standards, tailored to the unique environmental and industrial context here. Most companies manufacturing and selling PFAS products are based in the United States and Europe, where regulatory frameworks, pollution scenarios, and vested interests may differ significantly from Australia's.

Given these distinct needs, Australia requires dedicated funding to develop a specialised, coordinated research effort on PFAS. Currently, no single Australian institution or consortium has sufficient influence or resources to comprehensively address PFAS management across environmental, health, and regulatory dimensions. Establishing such a coordinated research body, supported by targeted government funding, would empower Australian institutions and universities to conduct focused research on PFAS removal and develop Australia-specific solutions. Consolidating resources in this way would accelerate our ability to respond to PFAS contamination and establish standards that protect our environment and public health, while reducing reliance on foreign research and regulatory models.

## 3. Improved Disposal Standards for Used PFAS Sorbents

The disposal of PFAS-laden materials, such as used sorbents, is a critical aspect of PFAS management often overlooked. PFAS-contaminated materials, if disposed of improperly, can lead to secondary contamination, worsening environmental and health impacts. Implementing standardized disposal guidelines that ensure environmentally sound practices for PFAS waste is essential. Currently, there is a need for established standards to guide the destruction of PFAS and the handling of concentrated PFAS waste streams resulting from treatment processes. These guidelines should encompass all stages of PFAS remediation, including collection, treatment, and disposal, to prevent further contamination and safeguard natural resources.

## 4. Establishment of State-Level PFAS Committees



Given the widespread nature of PFAS contamination, establishing dedicated PFAS committees in each state could enhance the coordination and management of PFAS-related issues. State-level PFAS committees could act as central hubs for gathering and disseminating information, coordinating local efforts, and providing guidance for regulatory compliance. These committees would serve as points of contact for communities, ensuring that public concerns are addressed efficiently and that affected populations receive timely support and resources.

### **Conclusion**

PFAS contamination poses an ongoing and complex challenge, and swift, comprehensive action is needed to manage and mitigate its risks. By addressing the points above, Australia could establish a more robust framework for PFAS management that is preventive, coordinated, and responsive to community needs. Additionally, a focus on best practices for data collection, monitoring, and public engagement will strengthen the nation's ability to respond effectively to PFAS challenges.