

## Submission

Australia Pacific Airports Corporation

### *Airservices Australia — PFAS Remediation of Former Fire Training Ground at Launceston Airport, Tasmania*

#### **1.1 Stated purpose of the proposed work and its suitability for that purpose**

Airservices Australia's (Airservices) proposes to remove and/or manage PFAS-impacted infrastructure, wastewater, soil, and sediments at the former fire training ground lease area on Launceston Airport. APAC supports this proposal. The proposed works will address source areas of contamination and is a valuable step in mitigating the ongoing migration of contamination from these sources onto the broader airport precinct, onto neighbouring properties, and into nearby waterways.

APAC notes Airservices' proposal to remediate 90% of PFAS in the soil and sediment. We accept that the challenges associated with these highly specialised works and acknowledge the diminishing returns when excavating at depth. On that basis, APAC is content with the proposed extent of the works including the remediation of most but not all PFAS.

The Environmental Remediation Order (ERO) issued to Airservices on 30 March 2023 by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA) requires Airservices to carry out remedial works in relation to pollution of soil and groundwater. Airservices' submission proposes to carry out remedial works in relation to soil but not groundwater, stating "Active remediation of groundwater was not considered to be a viable option."

It is APAC's understanding that Airservices is proposing to carry out remedial works in relation to soil and to further assess the merit of remedial works in relation to groundwater as more environmental data is collected by Airservices and subsequently Airservices then understands more about "the context of the site" as noted in their submission.

APAC has reviewed Airservices' Remediation Action Plan for the proposed works and considers the planned works to be suitable for the overall purpose stated.

APAC considers Airservices' proposal to immobilise contamination in soil and reinstate the soil, rather than remove or destroy the contamination, to be a reliable, reasonable, and practicable approach to managing this type of contamination.

#### **1.2 Need for the proposed work**

The Launceston Airport former fire training ground is a contaminated site primarily due to the PFAS pollution left by historical fire training activities. The contamination continues to migrate from this source area and is an ongoing source of contamination to the broader airport precinct, neighbouring properties, and nearby waterways.

The proposed work is needed to mitigate the spread of this contamination to the broader airport precinct, neighbouring properties, and nearby waterways. The benefits of this to the local community may include:

- families and businesses of neighbouring properties
- families and businesses of downstream irrigators
- local environment and ecosystems
- local tourism.

The proposed work is also needed to reduce the ongoing costs and liabilities of managing and developing contaminated land for Australia Pacific Airports (Launceston - APAL) (as the Airport Lessee) and the Commonwealth as the landowner.

### **1.3 Cost-effectiveness of the proposal**

APAC is limited in its ability to comment on the cost-effectiveness of the proposal, as the detailed cost breakdown is not publicly available and has not been provided to APAC. We note Airservices has submitted to the Committee a “confidential cost estimate (Submission 1.1)”.

In our broader experience, the disposal and immobilisation of PFAS-contaminated materials is an expensive process. The \$24 million provided by Airservices estimate is consistent with our experience in this highly specialised area.

### **1.4 Revenue the proposed work will produce and the current and prospective value of the work**

APAC does not expect this work to produce direct revenue and has not calculated the prospective value of the proposed work. APAC would welcome the opportunity to provide further detail or comment on calculations provided to Airservices and/or DITRDCA to the Committee.

However, APAC considers the prospective value to be significantly higher than the \$24 million that Airservices has requested, and potentially in the hundreds of millions of dollars when considering externalities including:

- the significant benefits to the local community of mitigating the ongoing migration of PFAS pollution (extending to the groups identified in 1.2 above)
- reduction of ongoing costs and liabilities of managing and developing contaminated land for APAL (as the holder of the Airport Lessee) and the Commonwealth as the landowner.

### **1.5 Conclusion**

APAC supports the proposed works to remediate PFAS-contaminated materials at Launceston Airport. The costs appear consistent with the nature and extent of the work and are of a high value when considered against the broader benefits to the community. Thank you to the Members of the Committee for considering these important works.