



WATER SERVICES
ASSOCIATION OF AUSTRALIA



WSAA SUBMISSION

PFAS National Environmental
Management Plan Consultation Draft

October 2017

Thank you for the opportunity to provide comment on the PFAS National Environmental Management Plan. The Water Services Association of Australia (WSAA) applauds the Heads of the EPA for their move to develop national guidelines to inform our member activities around the management of PFAS. WSAA supports the concept of a national collaborative approach to improve knowledge and develop better tools and frameworks to understand and manage risks.

About WSAA

The Water Services Association of Australia (WSAA) is the peak body that supports the Australian urban water industry. Our members provide water and sewerage services to over 20 million customers in Australia and New Zealand and many of Australia's largest industrial and commercial enterprises. WSAA facilitates collaboration, knowledge sharing, networking and cooperation within the urban water industry. The collegiate approach of its members has led to industrywide advances to national water issues.

Member feedback

WSAA represents the views of its members, a number of which will lodge individual submissions. WSAA understands that many of the questions that HEPA are seeking feedback on may generate responses that are specific to an individual utility's operations and local circumstances. For this reason, we offer support for our members' views.

We understand that the intent of the plan is to provide guidance on a range of water and wastewater management practices related to surface water, groundwater, marine water, recycled water, wastewater and solid waste.

On that, WSAA offer the following general comments:

1. Further research (and financial support for such research) is required to better understand the issue and to fill a number of information gaps around PFAS. For example, better understanding is needed around:
 - a. transport pathways that impact on a range of receiving environments to adequately assess and address risk
 - b. bioaccumulation
 - c. background catchment levels
 - d. aquatic ecosystems and ecological criteria for sediments
 - e. legacy versus new inputs
 - f. wastewater treatment technologies to remove PFAS
2. In addition, further clarification is sought for:
 - a. what the guideline levels mean and how they should be used for risk assessment and further investigations
 - a. trade waste and regulatory acceptance standards

- b. actions to ameliorate
 - c. risk assessment methodology for environmental and public health, including surface water, groundwater, land, wastewater, biosolids, sewer grit, drinking water, recycled water and stormwater.
3. HEPA are urged to ensure that the guidelines provide best practice advice around testing methodologies and consider that background levels of PFAS levels exist in the environment. Further investigation and clarification around analytical techniques is needed. This should include direction on the most appropriate parameters to measure and suitable guidelines to reduce some of the uncertainty faced by water utilities.
 4. Many PFAS issues are site specific. A clearer understanding and visibility of issues across a range of industry perspectives is required for an effective and multi-pronged approach to tackling PFAS.
 5. Overall, WSAA supports:
 - a. Consistent policy to address the management of materials from point source (including licensed trade waste discharge) to receiving environment.
 - b. Development of a national database to inform a rational basis for further policy development, remediation, investigations and remediation.
 - c. Development of a national standard for PFAS sampling and methodology for analysis
 6. However, at this stage, WSAA cautions against any adoption of the guideline values as enforceable limits to licences.

Contact details

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