

Submission on the draft PFAS National Environmental Management Plan Version 3.0

28 February 2023

SUBMITTER DETAILS

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Background comment and context of draft PFAS National Management Plan (version 3.0)

1. Along with several other man-made materials, PFAS contaminants are now very widespread internationally, including in the Australasian environment. There is now a substantial amount of scientific literature documenting this contamination. Much effort is currently underway in both North American and European jurisdictions to seek methods to both contain current PFAS contamination, and to reduce to a minimum any further PFAS contamination of the environment.
2. The widespread presence of PFAS internationally has triggered legislation aimed at curtailing their use, largely because of concerns associated their potential impact on animal and human health. Regulatory controls are most advanced in the European Union and the United States of America (see, for example, <https://echa.europa.eu/-/echa-publishes-pfas-restriction-proposal>).
3. Arguably, what sets Australia and Aotearoa New Zealand apart from many northern hemisphere nations is that there is no local manufacturing capability. All PFAS arriving in these jurisdictions is imported, either in the form of industrial products, or as sub-component(s) of a wide range of consumer products ranging from clothing to kitchen equipment. Many of our New Zealand consumer products are either of Australasian origin or imported from China (as is also the case for Australia).
4. Although it is unusual for consultation to be carried out in Aotearoa New Zealand on what is clearly an Australian Government document, it is also sensible for there to be trans-Tasman cooperation on measures to control the impacts of PFAS contamination. This joint approach is justified because of the shared geographic locations of Australia and New Zealand and by the significantly larger scientific critical mass of expertise present in Australia. There is also commonality between the issues that are likely to arise in the two jurisdictions.

Limitations of the draft PFAS NEMP 3.0

5. In EDS's opinion, the draft PFAS NEMP 3.0 is too narrow in scope. It is already abundantly clear that, in northern hemisphere jurisdictions, particularly in the European Union, management of this issue has already proceeded well beyond the mere identification and control of current contaminated sites. Emphasis has now switched to efforts to reduce (at source) the continued supply of PFAS to the environment. That is to be done by regulation aimed at reducing the use of PFAS in a wide range of products. There is extensive discussion in the scientific and popular literature of the aims of the current proposed European regulations.
6. EDS considers that an appropriate plan for problems generated by the presence of PFAS in Aotearoa New Zealand should have a much wider scope than that set out in the draft PFAS NEMP 3.0. Such a plan should involve, *inter alia*:

- (a) A NZ-wide survey (using the agreed standard methodology now adequately outlined in the draft PFAS NEMP 3.0) to identify New Zealand's pristine freshwater catchments which are not currently PFAS contaminated.
- (b) The subsequent preparation of site-specific *Management Plans* to ensure that these pristine areas are effectively protected against any future contamination.
- (c) The formulation of a national New Zealand plan that identifies (in order of priority) which of the contaminated sites that have already been identified might feasibly be de-contaminated, as opposed to being merely contained.

Is the draft PFAS NEMP 3.0 fit for purpose?

- 7. Subject to the above comments about the limitations of the draft PFAS NEMP 3.0, EDS considers that the draft PFAS NEMP 3.0 is fit for purpose. The draft plan sets out, in an appropriate fashion, a set of standard methodologies for measuring PFAS contamination. Appropriate standard methods are also outlined for both containing PFAS in sites known to be contaminated, and for disposal of the contaminated material.

Does the draft PFAS NEMP 3.0 continue to provide useful nationally consistent guidance and standards on PFAS contamination?

- 8. EDS considers that the draft PFAS NEMP 3.0 does continue to provide useful national guidance and standards on PFAS contamination. It is axiomatic that if scientific evaluations are to be made of specific contaminated sites, there needs to be sound and consistent methodologies employed. Those methodologies should yield accurate and reproducible measurements of the contaminants present. Desirably, a standard methodology should be adopted by all agencies involved. Although not specifically stated, that appears to be the intention and goal of the draft PFAS NEMP 3.0.

Conclusion

- 9. The draft PFAS NEMP 3.0, which is based on collaboration between New Zealand and Australian agencies, represents an important step forward. So too is the adoption of common methodologies for measurement of PFAS contamination and decontamination.
- 10. However, as indicated above, it is disappointing that the draft PFAS NEMP 3.0 is limited in scope, particularly given the size of the problem. Much greater effort and activity is underway in the northern hemisphere. The New Zealand/Australian effort should model that approach. In that context, the ambition of the current New Zealand /Australian approach is disappointing and appears limited in its collective environmental ambition.