

20 January 2021

Mark Bannister
Senior Policy Adviser
EPA Victoria
Email: mark.bannister@epa.vic.gov.au

Dear Mr Bannister,

RE: Multiple disposal sites for high volume continuous flow of materials requiring disposal

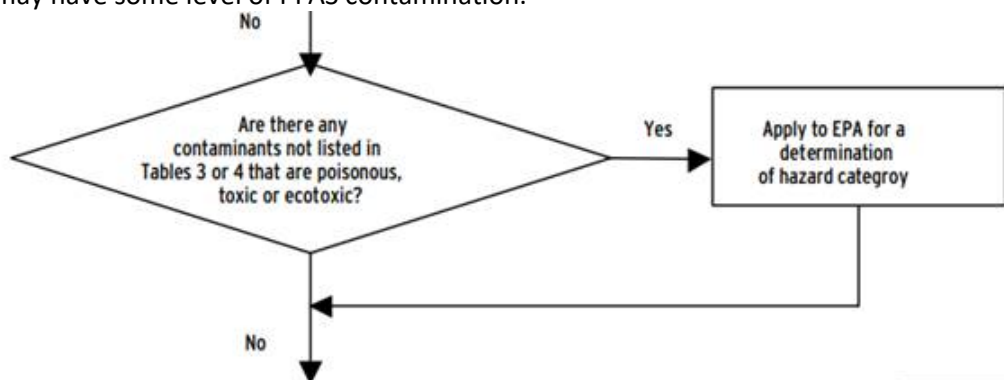
Dear Mr Bannister,

I write to you as the Chairman of the Australian Landfill Owners Association. Members of our Association operate engineered landfills which are licenced with the appropriate Regulator and accept the majority of waste disposed in Australia.

The purpose of this letter is to advise you of an anomaly within the Regulations in Victoria with respect to PFAS contaminated waste.

Our current experience in Victoria is that contaminated soil wastes are sampled, measured and based on the results of these measurements lead to Classification of Category A,B,C under the IWRG621. We believe this overall system works well, but for reasons unknown, PFAS contamination is excluded.

After 1 July 2021 in accordance with Publication 1828.1 Waste Disposal Categories – characteristics and thresholds, new categories and thresholds apply however the limits for PFAS which were in the draft Publication 1828.1 were removed from the final draft published in June 2020. The consequence of the removal of the threshold limits for PFAS under IWRG621 is that EPA must provide a Classification for each project that may have some level of PFAS contamination.



EPA Officers are therefore being unnecessarily, in our opinion, burdened with the task of classifying PFAS contaminated waste, when the classification could just as easily follow the method for all other contaminants.

We would be grateful if you could address this anomaly and allow the classification of PFAS contaminated waste in line with the classification of other contaminated waste streams.

Yours faithfully

Daniel Fyfe
Chair