



## Comments form:

### PFAS National Environmental Management Plan consultation draft

We welcome comments or suggestions on the draft PFAS National Environmental Management Plan. There are questions throughout the plan copied into this document. You can respond to these questions or make comments on any aspect of the Plan. This form also includes all the section headings if you have specific points that you would like to make on the text.

Your comments will help the development of the Plan. Please indicate below or clearly state if you would like your contribution to remain confidential. Note that Freedom of Information access requirements will apply to all comments, even those marked and treated as confidential. Accordingly, your comments may be released to the public.

Written submissions, including those using this form, should be emailed to **PFASNEMP@epa.vic.gov.au**  
Mail:

**PFAS NEMP Consultation Feedback**  
**c/o- Applied Science Directorate**  
**EPA Victoria**  
**GPO Box 4395 Melbourne VIC 3001**

If you would like to receive email updates on the PFAS NEMP, including details of opportunities for further participation in its development, please email us at **PFASNEMP@epa.vic.gov.au**

**Please supply your comments by Monday, 25 September 2017**

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Confidentiality requested? **No**

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## **ABOUT ALOA**

The Australian Landfill Owners Association (ALOA) was formed in late 2008. It is an incorporated entity with members from across Australia.

Modern landfills are an essential element in today's integrated waste management infrastructure as landfills:

- Offer cost effective and reliable disposal of recycling and processing residues and unsorted wastes;
  - Manage greenhouse gas emission by methane collection and combustion;
  - Provide a source of renewable energy;
  - Have the flexibility to accept variable waste volumes; and
  - Are reliable last resorts for the acceptance of large volumes of 'disaster' waste.
- Member landfills provide services to the public, local government, industry, property developers, mining and agriculture.

ALOA members receive and safely manage the disposal of almost three quarters of the waste landfilled in Australia. Since its inception ALOA has defended the interests of its members in national and state issues. In particular, ALOA campaigned for fairer treatment under the 'carbon' tax and worked closely with the Australian Local Government Associate (ALGA) to develop the Voluntary Waste Industry Protocol to utilise collected carbon tax monies.

ALOA is governed by a 'national' board and has state 'chapters' in each of the mainland states.

ALOA request to be kept informed of the development of the PFAS NEPM to ensure that appropriate and obtainable standards are established.

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**QUESTION 1:** Is the proposed purpose and scope, including the initial focus on PFOS, PFOA and PFHxS of the PFAS NEMP appropriate to address legacy PFAS contamination issues. What else would be required to enable a nationally consistent approach that enables decision making? Why do you think this? What are the priority areas where national consistency would be desirable?

The purpose and scope appear to be appropriate to address legacy PFAS contamination issues.

The PFAS NEMP contains several references that it will be flexible and require update as more information is learnt on PFAS.

Throughout the process, it is important that introduction of regulatory requirements (in particular at Landfill) are implemented with consultation with the industry and in a manner that enables compliance. The new requirements must recognise that many years of waste acceptance within the applicable Regulations should not result in penalising a facility based upon changing thresholds.

In particular, Water Authorities should be directed / encouraged to accept Trade Waste from Leachate Treatment Plants operating at engineered landfills accepting municipal waste. It is likely that there will be very low levels of PFAS in treated effluent however the larger impact of not having a disposal option for leachate has more potential to negatively impact the environment than the PFAS level in the effluent.

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**QUESTION 2:** What information would further inform the Australian occurrence of PFAS-contaminated materials and sites? Can you contribute to this information? What might limit your ability to provide this information?

The PFAS NEPM could establish baseline monitoring of landfill leachate and treated effluent to determine the risk profile for landfills.

ALOA may be able to assist in such a baseline study.

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**QUESTION 3:** What priority environment and human health criteria should be included in the PFAS NEMP. Can you provide any resources, such as technical reports or reviews, that should be considered?

ALOA is unable to provide comment on this question

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**QUESTION 4:** What resources (e.g. explanatory notes or guidelines) would be useful to accompany criteria values to explain how and why these values are set and what they mean for assessment of a contaminated site? How should the plan include or reference these resources?

**Prior to limits for discharge of effluents or classification of PFAS contaminated wastes, baseline testing needs to be undertaken to determine the current situation and avoid unintended consequences.**

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**QUESTION 5:** What are your observations of site assessment and management for PFAS-contaminated sites? Can you provide brief examples or case studies where a site assessment and management approach worked well and led to a good outcome on the site? Why do you think this worked well?

**ALOA is unable to provide comment on this question**

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**QUESTION 6:** What other PFAS specific resources are needed to accompany the ASC NEPM? What should these resources include? Are the important site investigation prioritisation factors identified?

**ALOA is unable to provide comment on this question**

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**QUESTION 7:** What experience have you had with the effective or ineffective containment of PFAS-contaminated materials and soils? Do you have examples or case studies that you can provide?

**ALOA is unable to provide comment on this question**

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**QUESTION 8:** What principles may be applicable to treatment and remediation of PFAS-contaminated materials? Why do you consider these principles important?

**Maximum Extent Achievable (MEA) and Comparison to Background principles whereby requirements on a site should not be more rigorous than background levels.**

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**QUESTION 9:** What treatment criteria and remediation objectives should be considered for inclusion in the PFAS NEMP? Please provide details explaining the nature and basis for these criteria and objectives.

**ALOA is unable to provide comment on this question**

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**QUESTION 10:** While noting that jurisdictions have individual approaches for setting specific landfill disposal criteria, what is your experience with the development of PFAS disposal criteria? Should the PFAS NEMP provide levels below which a material is non-contaminated or levels above which the PFAS content must be destroyed? Can you provide examples of applicable criteria, including how they were developed?

**ALOA is unable to provide comment on this question**

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**QUESTION 11:** What performance standards would be most helpful to provide clarity for industry and the community for the establishment of new treatment and remediation technologies?

**ALOA is unable to provide comment on this question**

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**QUESTION 12:** What are your views on the introduction of a PFAS specific waste code? For example: PFAS compounds or any material containing PFAS compounds.

**The introduction of a PFAS specific waste code must apply at a high level of concentration otherwise all carpet and furniture will be included. It needs to be very specific and relate to soils / contamination from fire fighting foam, storage of chemicals, and industrial applications of PFAS.**

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**QUESTION 13:** What other analysis methods are required (e.g. biota)? Are you able to provide suitable methods from recognised sources?

**ALOA is unable to provide comment on this question**

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**QUESTION 14:** The PFAS NEMP is expected to include a number of best practice approaches to community and stakeholder engagement resources to be used by the jurisdictions. Based on your experience, what has worked well when engaging on PFAS-related issues?

**ALOA is unable to provide comment on this question**

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**QUESTION 15:** HEPA is expected to consider research programs in priority areas. What areas would you recommend? Why would these be important research priorities? As research is completed, do you have suggestions on the best way to make this information available?

**ALOA is unable to provide comment on this question**

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**QUESTION 16:** What does success of the PFAS NEMP look like to you? How would you evaluate the success of the PFAS NEMP in meeting your expectations? What is your expectation on timing for the delivery of various components of the PFAS NEMP as well as the achievement of outcomes? How often should the outcomes be assessed?

**The PFAS NEMP should provide a framework to deal with PFAS that allows industry, the regulators and the community to progressively deal with PFAS as more information is gained. The PFAS NEMP should apply restrictive edicts which have the potential for unintended consequences. In the case of landfill regulations for the acceptance of PFAS wastes and the discharge to sewer of PFAS containing leachates, a full assessment of the economic social and environmental impacts is required.**

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**PFAS National Environmental Management Plan sections**

If you have specific comments or suggested text changes, please include the relevant paragraph number for Sections 1–9.

**ALOA does not have specific comments or suggested changes.**