

27 February 2023

Australian Government,
Department of Agriculture, Fisheries and Forestry,

Emailed to: pfasstandards@environment.gov.au

Attn: Heads of EPAs of Australia and New Zealand (HEPA)

Dear Coordinators,

Submission from the Manawātū District Council on the draft per- and poly-fluoroalkyl (PFAS) National Environment Management Plan (NEMP) Version 3.

Manawatu District Council (MDC) thanks HEPA for the opportunity to submit on the draft PFAS National Environment Management Plan (version 3.0).

Background

MDC's experience with PFAS dates back to late 2017 when the government announced that it was testing some properties around the New Zealand Defence Force Base Ohakea for water contamination from PFAS compounds. About 105 properties were identified as being within the PFAS plume area when the contamination was first discovered. It is significant to note that the first PFAS NEMP had not been released until February 2018.

Despite the gap in national direction on managing PFAS contamination, MDC supported the residents in the plume area of the contamination and got involved in the project design of a water scheme in September 2020. The project involved collaborations with the Ministry for Environment, New Zealand Defence Force, Horizons Regional Council, and iwi Ngāti Parewahawaha. The project was commissioned in 2022 and included the construction of a new bore, reservoir, and water treatment plant in Sanson, and a 28-kilometre pipe network that connected the treated water to the affected houses and farms. Although these measures did not eradicate PFAS contamination as PFAS still remains in the aquifer, the new water scheme circumvents the direct contaminated area, protecting the health of people, animals, and land in the area.

Guiding Principles of the PFAS NEMP

MDC agrees with the guiding principles of the current version of the PFAS NEMP, particularly the precautionary principle, polluter pays principle, conservation of biological diversity and ecological integrity principle, improved valuation, pricing and incentive mechanisms principle and the intergenerational equity principles.

Limited Environmental Data on PFAS

MDC is concerned about the limited environmental data around PFAS currently in New Zealand. Where there is a lack of robust and readily available scientific information or data, such as sources and pathways of exposure, detection and measurement, fate and transport, and a comprehensive evaluation of the effects of the classes of PFAS evaluated on human health and the environment, this will impact on the development of PFAS risk reduction

approaches as it limits the risk assessment quality. There is currently no information in the plan on how to navigate this challenge.

MDC is concerned that there may be challenges in sharing information gained from investigations of PFAS contamination to enable MDC to have a better understanding of PFAS contamination. Quantitative metrics, for example, levels of the classes of PFASs found in environmental media (e.g., in water and soil) and in humans (via biomonitoring data) that enable delegations to monitor progress in reaching risk reduction goals need to be communicated to relevant stakeholders.

National Database on PFAS

MDC currently monitors its wastewater treatment plant for PFAS and considers that it would be useful to have a national database that prescribes a national baseline. A national database would increase our knowledge which in turn would identify where proactive monitoring is warranted.

MDC notes that the PFAS NEMP version 3 is a useful plan to manage future PFAS contamination and overall, supports the provisions in the PFAS management plan as it provides consistency on a national basis.

Recommendations

- That the final PFAS NEMP include information on sources and pathways of exposure, detection and measurement, fate and transport, and a comprehensive evaluation of the effects of the classes of PFAS evaluated on human health and the environment.
- That adequate resourcing is provided to enable environmental data gathering and sharing among councils within New Zealand and between New Zealand and Australia.
- That a national database that prescribes a national baseline is established to enable proactive monitoring when needed.

Thank you for the opportunity to make a submission.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'H. Worboys', with a large loop at the end.

Helen Worboys
Mayor, JP