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Reference: 021-24

11 November 2024

Ms Cate Faehrmann MLC
Committee Chair
Select Committee on PFAS Contamination in Waterways and Drinking Water Supplies throughout
New South Wales
NSW Parliament
6 Macquarie Street
SYDNEY NSW 2000

By email to: pfas@parliament.nsw.gov.au

Dear Ms Faehrmann,

Re: Submission to NSW parliamentary inquiry into PFAS Contamination in Waterways and Drinking Water Supplies throughout NSW

The Sydney Coastal Councils Group (SCCG) welcomes the opportunity to provide a submission to the above inquiry. Below is a series of issues and recommendations which the SCCG believes should be considered in addressing PFAS contamination.

1. Relevance to the SCCG

SCCG is a regional organisation of councils established in 1989 to promote the sustainable management of Sydney's coasts and estuaries through collaboration, capacity building, advocacy and research. We comprise nine member councils who represent approximately 1.3 million Sydneysiders.

SCCG is guided by its [2019-2029 Strategic Plan](#) which outlines goals related to healthy coastal waterways, marine biodiversity, liveable cities and climate resilience. Goals 2 and 3 of the strategic plan specifically aim to protect the health of our marine areas, urban waterways and foreshore across the Sydney region by reducing direct and indirect pollution.

Our member councils are reasonably aware of the major sites with PFAS contamination within their local government areas (LGAs). These sites are well illustrated in references like the [Australian PFAS Chemicals Map](#).

Councils are concerned about the impact of PFAS contamination of urban waterways, stormwater, groundwater and recycled wastewater for which councils have some management responsibility. Although recorded levels of PFAS are generally low in most instances, councils are worried about the long-term ecological and human health impacts of PFAS.

The following is a summary of the major issues raised by our member councils. This summary should be read together with individual submissions made by our member councils.



Sutherland Shire
COUNCIL



INNER WEST



WAVERLEY
COUNCIL



Bayside Council

northern
beaches
council



WILLOUGHBY
CITY COUNCIL
City of Diversity



Randwick City Council
a sense of community



2. Issues with PFAS contamination

The use of PFAS in firefighting practices has been a focus of media attention and scientific investigation in recent years. Whilst important, PFAS associated with firefighting accounts for only about 3% of the overall use of PFAS. It is therefore necessary to consider other sources and types of PFAS.

To this end, SCCG supports Professor O'Carroll's call in his submission to the [Senate Select Committee on PFAS](#) to compel industry to provide further information on the historical use of PFAS in order to better direct investigation into human and ecosystem health impacts of PFAS. We also share Professor O'Carroll's concerns about the difficulty in predicting the environmental impacts of PFAS given there is an insufficient number of the nearly 14,000 chemicals that make up the PFAS class that are actively sampled and quantified.

We know that PFAS has been detected throughout the Sydney region in in treated and untreated wastewater and stormwater. Councils are concerned about the environmental and human health impact of recycled wastewater contaminated with PFAS, where water is used for irrigation of public open space. Councils are also concerned about PFAS mixing with wastewater and other pollutants in the marine environment to form 'tar balls' as recently reported by the [Sydney Morning Herald](#). Its presence in stormwater can also have an impact on swimmability at our beloved beaches as well as having detrimental effects to marine biodiversity.

Groundwater can also become contaminated with PFAS derived from firefighting practices (such as employed at Caltex Kurnell, Sydney Airport and Botany Industrial Park) and from leachate from non-engineered landfills. Councils are concerned about the potential for human contact with contaminated groundwater through private and often unapproved groundwater bores, or through excavation and dewatering operations at development sites. We would like further guidance on how best to apply development consent conditions around managing PFAS contaminated groundwater on development sites.

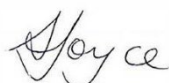
For highly contaminated sites, 'cap and contain' option should be considered (in a similar way to asbestos) rather than off-site disposal. The SCCG also supports Professor O'Carroll's recommendation for further research into cost-effective PFAS treatment technologies that are an alternative to current PFAS adsorption and concentration methods that ultimately rely on disposal to landfill.

We recommend that additional funding should be allocated to investigate the environmental fate of PFAS and any subsequent human and ecosystem health impacts. This should include funding for local councils to undertake PFAS monitoring and mapping within their LGAs.

We also support the [NSW Ocean Outlook Programme](#), led by the Sydney Institute of Marine Science, that is using enhanced water quality monitoring techniques to determine the source of pollutants such as PFAS in stormwater runoff and wastewater overflows.

I trust our submission will be useful for your inquiry. Please do not hesitate to contact me via email at sarah@sydneycoastalcouncils.com.au if you have any queries.

Yours sincerely



Sarah Joyce
Executive Director