

RE NEW STANDARDS FOR PFOS/PFAS IN WASTEWATER DISCHARGE

To whom it may concern,

The National Waste and Recycling Industry Council ([NWRIC](#)) acts as the industry's national policy setting body. Its core activity is to proactively engage with all of the industry's key stakeholders to promote solutions to the regulatory challenges facing the sector.

The founding members of the Council - Alex Fraser Group, Cleanaway, J. J. Richards and Sons, Solo Resource Recovery, Sims Metal Management, Suez, Toxfree, Remondis, ResourceCo and Veolia - represent the majority of the private capital invested into waste management and recycling assets in Australia.

While the Council is a national body, it also works pro-actively with Affiliates, which represent the interests of the industry at a State level. Through collective action, the Council and its State-based partners form a network representing the industry Australia wide¹.

BEST STANDARDS FOR THE CONTROL OF PFOS/PFAS CONTAMINATION

The Council notes the Victorian EPA is leading the national effort to develop a standard for the treatment and disposal of PFOS/PFAS. In regard to developing a new national standard, we would like to note the following;

1. The NWRIC supports the precautionary principle in regard to the treatment of PFOS/PFAS contamination.
2. Throughout the process, it is important that the introduction of new regulatory requirements (in particular at landfills) are implemented with consultation with the industry and in a manner that enables compliance. For changes to compliance requirements, industry should be given sufficient notice to be able to install new processing plant.
3. The new requirements must recognise that many years of waste acceptance at landfills within the applicable jurisdictional regulations - they should not result in penalising a facility based upon 'backdated' changing thresholds.
4. In particular, Water Authorities should be directed and encouraged to accept trade waste from leachate treatment plants operating at engineered landfills. 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.
5. Further, it is important that PFOS/PFAS discharge standards not be set at a level (that is, zero or below drinking water standards) which will result in perverse environmental outcomes. Such outcomes could include;

¹ NWRIC's state 'Affiliates' are; the Waste Recycling Industry Association of Queensland (WRIQ), the NSW Waste Contractors and Recyclers Association (WCRA), the Victorian Waste Management Association (VWMA), the Waste Recycling Industry Association of South Australia (WRI-SA) and the Waste Recycling Industry Association of WA (WRI-WA) and the Waste Recycling Industry Association of the Northern Territory (WRI-NT). They represent every Australian jurisdiction except Tasmania.



- a. No disposal options available for landfill leachate,
 - b. Very large new waste volumes being categorised at Prescribed Industrial Waste in Victoria or hazardous waste in other states and,
 - c. The subsequent or potential stockpiling of biosolids or PFAS/PFOS contaminated wastes.
6. The Council believes that thermal destruction is the best measure to dispose of PFOS/PFAS processing residue.

For further information on this important matter, please contact me.

Sincerely,

Max Spedding
CEO, NWRIC
0400 880 677
ceo@nwrlic.com.au