

PFAS NATIONAL ENVIRONMENTAL MANAGEMENT PLAN AND BIOSOLIDS

The Australian and New Zealand Biosolids Partnership (ANZBP) is an initiative of the Australian Water Association and is the peak organisation representing the biosolids industry in Australia and New Zealand. As such, we would request that your organisation include the ANZBP as a key stakeholder when dealing with matters relating to biosolids. The ANZBP is committed to the sustainable use of biosolids.

PFAS is a national concern and the PFAS National Environmental Management Plan impacts on biosolids use. The ANZBP commissioned a national survey of PFAS in biosolids and has published this to its members. In addition, the ANZBP has made estimates of safe levels of PFAS in biosolids, to the extent current research provides sufficient information and consistent with the methods used to determine limits for other contaminants in biosolids. The relevant paper (attached) has been accepted into the peer-reviewed Australian Water e-journal.

As the peak biosolids organisation, the ANZBP has some concerns about the safe levels of PFAS which are proposed under the HEPA PFAS National Environmental Management Plan. Specifically, safe limits for PFOS and PFOA have been proposed for soils which, if used inappropriately, have the potential to significantly impact or prevent the beneficial use of biosolids in Australia. These safe limits proposed for soils appear to be based on limited research data and conservative assumptions and vary greatly from the estimates made by the ANZBP.

The ANZBP would ask that the research basis, methodology and assumptions in reaching any recommended safe limits for PFAS in biosolids be made available to us and that our organisation is included in the conversation in the development of safe limits, including assumptions of biosolids application rates for restricted-use agricultural applications.

We would request and urge your organisation to include the ANZBP in any developments relating to biosolids. Should you have any questions, please do not hesitate to contact me.

Yours faithfully

Paul Darvodelsky

Paul Darvodelsky, Chair, Australian and New Zealand Biosolids Partnership

Attachment: Summary report *Assessment of Emergent Contaminants in Biosolids, September 2017*