

Submission
No 34

**INQUIRY INTO INQUIRY INTO PFAS CONTAMINATION
IN WATERWAYS AND DRINKING WATER SUPPLIES
THROUGHOUT NEW SOUTH WALES**

Organisation: Narrabri Shire Council

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Our Reference: 2215928 DLA:SR
Your Reference:
Contact Name: Donna Ausling

Attention: Ms Cate Faehrmann MLC
Committee Chair
Select Committee on PFAS Contamination
Upper House Committees
Parliament of NSW

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

Wednesday, 27 November 2024



Select Committee on PFAS Contamination – Confidential Narrabri Shire Council Submission

Dear Madam Chair,

Thank you for the opportunity to provide feedback in relation to the Inquiry into PFAS contamination in waterways and drinking water supplies throughout New South Wales.

It is understood that the following terms of reference (ToRs) are applicable to the current review process:

1. *That a select committee be established to inquire into and report on PFAS (per and polyfluoroalkyl substances) contamination in waterways and drinking water supplies throughout New South Wales, and in particular:*
 - (a) *the adequacy and extent of monitoring and data collection on PFAS levels in waterways and drinking water sources*
 - (b) *the adequacy of the reporting and disclosure requirements to the public of monitoring and findings on PFAS contamination of water*
 - (c) *the identification of communities at risk from PFAS contamination*
 - (d) *the adequacy and effectiveness of government engagement with and support for communities disproportionately affected by PFAS contamination, including First Nations communities*
 - (e) *sources of exposure to PFAS, including through historic and current firefighting practices*
 - (f) *the health, environmental, social, cultural and economic impacts of PFAS*
 - (g) *the impacts, monitoring and mitigation of contamination on livestock, domestic animals and wildlife, including water birds, fish and other aquatic life*
 - (h) *the structure, capacity, capability and resourcing of New South Wales Government agencies and water utilities to detect, monitor, report on, respond to and mitigate against PFAS contamination of water supplies, including the adequacy of infrastructure and resources*
 - (i) *the adequacy and effectiveness of New South Wales's legislative and regulatory framework in testing for, monitoring, mitigating and responding to PFAS contamination, including the adequacy of health-based guidance values, as*



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compared to the standards and practices of other Australian and international jurisdictions

(j) public sector resourcing and coordination amongst relevant agencies in preventing controlling and managing the risks of PFAS to human health and the environment

(k) international best practices for water treatment and filtration, and the environmentally sound management and safe disposal of PFAS

(l) the effectiveness of remediation works on specific sites and international best practices for remediation and management of contaminated sites

(m) areas for reform, including legislative, regulatory, public health and other policy measures to prevent, control and manage the risks of PFAS in water supplies

(n) the impact of taking contaminated water sources offline on water security, including the effects of diverting water between communities; the social, economic and logistical implications of such diversions, and the challenges posed by PFAS contamination to water availability, drought management and emergency supply planning, and

(o) any other related matter

Council thanks the NSW Government for the opportunity to provide feedback in relation to this important body of work.

Local Context

Narrabri Shire is a [local government area](#) in the [North West Slopes](#) region of NSW. The primary settlement of Narrabri is located adjacent to the [Namoi River](#) and at the confluence of the [Newell](#) and [Kamilaroi Highways](#). The local government area (LGA) is strategically positioned halfway between Sydney and Brisbane and is considered to be resource-rich. Key local industries include mining and agriculture. At the last census (2021) the resident population was 12,721 persons.

Narrabri Shire Council's vision is articulated in the Community Strategic Plan as follows:

"Narrabri Shire will be a strong and vibrant regional growth centre providing a quality living environment for the entire Shire community."

The township of Narrabri is considered to be one of the most flood prone settlements in NSW. The community of Wee Waa, located west of Narrabri, is periodically completely isolated by flood waters for long periods (up to two weeks) and is protected by a ring levee. Narrabri Shire contains a number of vulnerable and at-risk communities that are flood-affected. These communities have a high Aboriginal population, low socio-economic base and are also ageing in nature. Narrabri Shire is a socially disadvantaged community with a SEIFA Score of 936 and a corresponding SEIFA Rank of 200 (Source: Australian Bureau of Statistics, Index of Relative Socio-economic Advantage and Disadvantage (IRSAD)).

Narrabri Shire Council is the designated water authority and operates three (3) sewerage treatment plants (STPs) and a total of seven (7) reticulated (potable) water supply systems containing eleven (11) bores. This important infrastructure services a number of communities located throughout the Shire, which has a geographical area of approximately 13,000 km².

Like many rural and regional Councils, Narrabri Shire Council has ageing infrastructure and there are ongoing challenges with long term financial sustainability.

Narrabri Shire Council provides the following feedback in relation to the Inquiry:

1. It is noted that Australia's National Health and Medical Research Council (NHMRC) has released a draft update to its 2018 guidelines around safe levels of PFAS in drinking water. Under the previous guidelines, the NHMRC recommended perfluorooctanoic acid (PFOA) levels be kept under 560 nanograms a litre (ng/L). The new draft recommends a limit of 200 ng/L.

Previously, safe levels of perfluorooctane sulfonic acid (PFOS) and perfluorohexane sulfonic acid (PFHxS) were capped at a combined total of 70 ng/L. The new draft guidelines suggest PFOS levels be lowered to 4 ng/L and PFHxS limited to 30 ng/L.

The fourth and final PFAS included in the draft guidelines was perfluorobutane sulfonic acid (PFBS), which the NHMRC recommends limiting to 1,000 ng/L.

2. In line with recent NSW Health advice, Council has recently commenced a testing regime across its drinking water supply assets. The first analysis has revealed that one sampling location of the eleven in total has a minor exceedance of the new acceptable thresholds. This particularly asset services the township of Narrabri. Given this exceedance, Council is currently arranging for the site in question to be re-examined and retested to ensure data accuracy.
3. The introduction of the new guidelines and applicable thresholds has created an additional cost burden which was previously unbudgeted. Council has needed to engage additional resources to complete testing and to verify those results. This comes at a significant additional cost on an already financially strained local government authority. Like many water supply authorities, Council has struggled over the years to attract and retain suitably qualified and experienced staff and there remains significant skills shortages and workforce gaps for Water Operators across the local government sector.
4. The introduction of any additional legislation or compliance obligations must appropriately consider financial and practical impacts to Councils. The ongoing challenges with local government financial sustainability is well documented and this is currently subject to two inquiries at the State and Federal level. Both tiers of governments must support Councils through any associated processes both financially and in respect of ancillary support including, but not limited to, training and further skills development.

5. A significant amount of community fear and uncertainty surrounds the issue of PFAS contamination. To assist in proactively managing community enquiries, and generally raising community awareness, careful consideration should be given to the creation of additional readily accessible and centralised information resources for the community and water authorities, including those of a technical nature.
6. It is considered that further and sustained research is needed to better understand the extent of PFAS contamination and the efficacy of associated remediation programs. Further, any associated sampling programs should be well managed, appropriately resourced and should not be an ongoing burden on local Councils as part of a clandestine cost-shifting process. The costs of implementing and maintaining technology that removes chemicals are likely to be significant and opportunities exist for 'polluter pays' financial recovery opportunities need to be further explored.
7. A multi-agency approach to managing PFAS contamination is paramount. The responsibility for managing PFAS contamination must also be well-defined and enshrined in legislation.
8. Council supports the current position of the National Health and Medical Research Council in that any detections of PFAS higher than the proposed new guideline values should not be viewed as a pass/fail measure but should be investigated and actions taken to bring the supply within the guideline values.
9. Ongoing assistance is needed to vulnerable and disadvantaged communities. Opportunities for further engagement with First Nations communities, and commensurate culturally appropriate support should be considered using existing networks and established relationships.
10. Many households within the Narrabri community rely on untreated water supplies sourced from bores and/or via rainwater tanks. The health of residents in these types of households outside of the reticulated water supply network must also be considered. On this basis, the expansion of the current sampling regime may be required to create an improved understanding and baseline data set, particularly in areas that are known PFAS sites.
11. Urgent clarity is sought around the sampling regime to enable local government authorities to appropriately plan and resource for these impending obligations. As detailed previously, ongoing financial assistance is needed. On this basis Council supports both the continuation and expansion of the NSW Government's \$32.8 million Town Water Risk Reduction Program beyond the programmed expiry date of June 2028.

Should you require any additional information or clarification in this regard you are invited to contact Council's Director Planning and Sustainability, Ms Donna Ausling at
or by emailing

Yours faithfully,

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Interim General Manager