

Response provided to journalist
29 July 2018

Questions:

1/ What does Defence say in response to the following concerns raised by the NSW Govt?

- That Defence sampling of aquatic biota needs to provide sufficient data to enable robust risk assessment to be undertaken and if required dietary advice provided.
- That Defence also needs to have greater consideration of advice provided by NSW Govt particularly in develop of appropriate sampling methodology.
- That there are concerns about Defence's slow pace of work towards containment and remediation of contamination and the appropriateness of communications about this issue with affected communities.
- That there are concerns that Defence has limited it's remediation activities primarily to treatment of surface water and groundwater and removal of silt sediment from open drains.

2/ Has Defence provided NSW as requested with additional data to inform the containment and remediation options that can be implemented?

3/ What does Defence say to the following concerns raised by QLD?

- The Queensland Government says there is room for improvement from Defence with regard to proactive and timely communication of information about its investigations to local communities.
- It cites as an example, the recent case of RAAF Amberley where high levels of PFAS were found in preliminary sampling of fish in the Bremer and Warrill Creek areas. It was only after protracted negotiations with Defence that the Qld govt made the decision to notify the public.

Response to all:

Defence regularly meets with the New South Wales Environment Protection Authority (NSW EPA) and other relevant state authorities during the conduct of PFAS environmental investigations. This is standard practice across all States and Territories. Defence engaged with relevant NSW Government authorities during its investigation process and considered all feedback to inform its final sampling rationale and methodology.

Defence investigations into PFAS are conducted in accordance with the National Environmental Protection Measure (Site Contamination) investigation principles, which is the official, appropriate Commonwealth standard. This includes conducting risk assessments into Ecological Risk and/or Human Health Risks, including identifying activities which may lead to elevated exposure to PFAS.

Defence collaborates with the NSW EPA and other NSW Government authorities to ensure sufficient sampling is undertaken to inform the risk assessments, which are required under a NEPM compliant environmental investigation. Defence has been, and continues to be, responsive to requests from the NSW EPA to conduct further sampling to inform its investigation and risk assessments.

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The sampling plans developed to inform the detailed investigations and risk assessments are shared with the NSW EPA and each site's state accredited Site Auditor. These plans are proposed by the independent environmental consultants undertaking the investigations, not by Defence, and are provided to NSW EPA and its expert panel for consideration and comment. NSW EPA feedback is considered and sampling plans adjusted where appropriate.

For the RAAF Base Williamtown environmental investigation, Defence has taken over 10,000 individual samples, including samples of groundwater, surface water, soil, sediment and biota (fruit, vegetables, aquatic and terrestrial species).

Defence does not have an environmental health regulatory role and relies on relevant state authorities to issue advisories to community members about ways they can minimise exposure to PFAS, including providing any dietary advice which may be necessary. This has been the consistent approach taken by Defence across all communities in Australia. Defence is not an environmental authority.

Defence continues to share its investigation data with the NSW EPA and other relevant State government authorities to inform any decisions they may need to take in regards to releasing precautionary advice to PFAS affected communities to minimise exposure to PFAS.

Defence provides opportunities for State government authorities to address the community at community engagement events. These events are conducted by Defence to inform communities of investigation progress, outcomes and, where required, any interim response management measures.

PFAS management technologies are continuing to emerge, with water treatment currently proving effective at removing the three PFAS compounds of concern (perfluorooctane sulfonate (PFOS), perfluorooctanoic acid (PFOA) and perfluorohexane sulfonate (PFHxS)) from water. Defence has been operating water treatment facilities at RAAF Base Williamtown since late 2015 to remove PFAS from water including treating surface water leaving the Base. Over 1 billion litres of water has been treated to below the limit of reporting for PFOS, PFOA and PFHxS.

Defence continues to operate surface water treatment facilities and has recently installed a water treatment plant to commence treating ground water from the Former Fire Training Area which is a known high concentration source area. In addition, plans are underway to install a water treatment plant to commence treating groundwater from a high concentration area off-base. These water treatment plants will continue for the foreseeable future.

The soil within the on-base drains at RAAF Base Williamtown was identified as a source of PFAS which was able to migrate off-base through surface water travelling within the drains. To reduce migration of PFAS off the Base, 2.7 km of drains were excavated and 996 tonnes of soil removed and disposed of in accordance with NSW EPA Guidelines.

Soil treatment technologies, also developing technologies given the very recent research and development of responses to PFAS contamination internationally, are being trialled by Defence. Defence will commence

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removing soil from source areas with high concentrations of PFAS in soil. This will remove a source of PFAS and contain it to the RAAF Base Williamtown site.

Defence takes advice from environmental experts on remediation options and has engaged independent environmental consultants to provide services to support the management and/or remediation of water and soil contaminated with PFAS at RAAF Base Williamtown, RAAF Base Edinburgh, Army Aviation Centre Oakey and RAAF Base Tindal.

Since 2016 Defence has sought advice from the NSW EPA about additional remediation activities which they consider Defence should implement to mitigate the impact of PFAS.

Defence continues to collaborate with relevant government authorities and shares its investigation and remediation data with these authorities. Any request for additional data would be willingly provided.

Consistent with the engagement with NSW government authorities, Defence has shared investigation data with relevant Queensland Authorities. This includes all of its sampling results from the RAAF Base Amberley detailed environmental investigation.

This enables those authorities to issue any precautionary advisories which they considered necessary to reduce exposure to PFAS. This is consistent with the approach taken for PFAS environmental investigations across all other jurisdictions.

The initial seafood sampling results for the RAAF Base Amberley investigation were provided to the relevant Queensland Health authorities when they were received. Queensland Health conducted an assessment using the initial testing results and, as the regulatory authority, decided to release precautionary advice regarding fish caught in the Bremmer River and Warrill Creek near RAAF Base Amberley.

Defence does not have an environmental health regulatory role, therefore all advisories, in every case and in each jurisdiction, arising from Defence PFAS Environmental Investigations have been issued by the relevant state or territory environmental health regulator. Defence widely publicises these advisories in all engagements it undertakes with community members including community events, the Defence PFAS website and community newsletters.

Defence is committed to being open and transparent on the conduct of its National PFAS Investigation and Management Program and recognises the importance of sharing its data and findings to relevant government authorities to inform any advisories they have the jurisdictional accountability to issue.