##

## Comments form: PFAS National Environmental Management Plan consultation draft

We welcome comments or suggestions on the draft PFAS National Environmental Management Plan. There are questions throughout the plan copied into this document. You can respond to these questions or make comments on any aspect of the Plan. This form also includes all the section headings if you have specific points that you would like to make on the text.

Your comments will help the development of the Plan. Please indicate below or clearly state if you would like your contribution to remain confidential. Note that Freedom of Information access requirements will apply to all comments, even those marked and treated as confidential. Accordingly, your comments may be released to the public.

Written submissions, including those using this form, should be emailed to **PFASNEMP@epa.vic.gov.au**

Mail: **PFAS NEMP Consultation Feedback c/o- Applied Science Directorate, EPA Victoria GPO Box 4395 Melbourne VIC 3001**

If you would like to receive email updates on the PFAS NEMP, including details of opportunities for further participation in its development, please email us at **PFASNEMP@epa.vic.gov.au**

**Please supply your comments by Monday, 25 September 2017**

Name (optional):

Organisation (optional):

Address (optional):

Position (optional):

Email (optional):

Confidentiality requested? Yes/No

**QUESTION 1:** Is the proposed purpose and scope, including the initial focus on PFOS, PFOA and PFHxS of the PFAS NEMP appropriate to address legacy PFAS contamination issues. What else would be required to enable a nationally consistent approach that enables decision making? Why do you think this? What are the priority areas where national consistency would be desirable?

**QUESTION 2:** What information would further inform the Australian occurrence of PFAS-contaminated materials and sites? Can you contribute to this information? What might limit your ability to provide this information?

**QUESTION 3:** What priority environment and human health criteria should be included in the PFAS NEMP. Can you provide any resources, such as technical reports or reviews, that should be considered?

**QUESTION 4:** What resources (e.g. Explanatory notes or guidelines) would be useful to accompany criteria values to explain how and why these values are set and what they mean for assessment of a contaminated site? How should the plan include or reference these resources?

**QUESTION 5:** What are your observations of site assessment and management for PFAS-contaminated sites? Can you provide brief examples or case studies where a site assessment and management approach worked well and led to a good outcome on the site? Why do you think this worked well?

**QUESTION 6:** What other PFAS specific resources are needed to accompany the ASC NEPM? What should these resources include? Are the important site investigation prioritisation factors identified?

**QUESTION 7:** What experience have you had with the effective or ineffective containment of PFAS-contaminated materials and soils? Do you have examples or case studies that you can provide?

**QUESTION 8:** What principles may be applicable to treatment and remediation of PFAS-contaminated materials. Why do you consider these principles important?

**QUESTION 9:** What treatment criteria and remediation objectives should be considered for inclusion in the PFAS NEMP? Please provide details explaining the nature and basis for these criteria and objectives.

**QUESTION 10:** While noting that jurisdictions have individual approaches for setting specific landfill disposal criteria, what is your experience with the development of PFAS disposal criteria? Should the PFAS NEMP provide levels below which a material is non-contaminated or levels above which the PFAS content must be destroyed? Can you provide examples of applicable criteria, including how they were developed?

**QUESTION 11:** What performance standards would be most helpful to provide clarity for industry and the community for the establishment of new treatment and remediation technologies?

**QUESTION 12:** What are your views on the introduction of a PFAS specific waste code? For example: PFAS compounds or any material containing PFAS compounds.

**QUESTION 13:** What other analysis methods are required (e.g. biota)? Are you able to provide suitable methods from recognised sources?

**QUESTION 14:** The PFAS NEMP is expected to include a number of best practice approaches to community and stakeholder engagement resources to be used by the jurisdictions. Based on your experience, what has worked well when engaging on PFAS-related issues?

**QUESTION 15:** HEPA is expected to consider research programs in priority areas. What areas would you recommend? Why would these be important research priorities? As research is completed, do you have suggestions on the best way to make this information available?

**QUESTION 16:** What does success of the PFAS NEMP look like to you? How would you evaluate the success of the PFAS NEMP in meeting your expectations? What is your expectation on timing for the delivery of various components of the PFAS NEMP as well as the achievement of outcomes? How often should the outcomes be assessed?

**PFAS National Environmental Management Plan sections**

If you have specific comments or suggested text changes, please include the relevant paragraph number for Sections 1–9.

**Preface**

**Executive summary**

**Introduction**

**PFAS Summit**

**Purpose and scope**

**Guiding principles**

**Other relevant plans and guidelines**

**1 Human health**

**2 PFAS occurrence**

**3 Environmental and health criteria**

**4 Contaminated sites assessment**

**5 Contaminated site management, including containment, remediation, treatment and disposal**

**6 Storage and transport**

**7 Environmental monitoring and analysis**

**8 Stakeholder engagement, communication and data sharing**

**9 Research, review and evaluation**

**Appendix A: PFAS sub-classes**

**Appendix B: Australian interim/draft criteria and standards for PFAS**

**Appendix C: Treatment technologies available in Australia**

**Appendix D: Interim/draft landfill disposal criteria**