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| General/overall comments |
| The Department of Defence is supportive of Option 4, outlined in the Consultation Regulation Impact Statement, to ratify the Stockholm Convention and phase-out all non-essential uses of PFOS and PFOS-related chemicals nationally. Defence has consulted across the organisation to seek advice on:   * uses of products that contain PFOS across Defence; * consumption volumes; * existing and contracted stocks; * alternative or replacement technologies; * any impact of seeking a suitable replacement; and * likely timeframe required for transition to a replacement product.   All respondents indicated that a national phase out of PFOS and PFOS-related chemicals for non-essential uses would not adversely impact Defence capability. All respondents indicated that where products which contained PFOS are being used, alternatives are available. These alternatives provide the same outcome as currently used products, while also complying with our prospective international obligations under the Stockholm Convention, should the Australian Government decide to ratify.  Defence’s primary historical use of PFOS and PFOS-related chemicals has been through the use of aqueous film-forming foam (AFFF) used to fight fires. Defence relies on the use of AFFF to ensure personnel safety, the safety of capability and infrastructure, and for training purposes. AFFF foams currently used by Defence do not contain PFOS or PFOS-related chemicals as active ingredients, and Defence policy precludes procurement of such foams.  Defence does use PFOS and PFOS-related chemicals in chrome-plating and radiography, but alternatives which would not involve PFOS or PFOS-related chemicals are available and a transition is considered manageable without a material impact to Defence capability. Other minor uses of PFOS and PFOS-related chemicals in Defence are considered essential and will not be affected by ratification of the Stockholm Convention.  As a result, Defence supports the implementation of Option 4 to fully ratify the Stockholm Convention. |

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| **Specific comments – please insert your specific comments below, listed against the part of the Consultation Regulation Impact Statement to which they apply** | |
| **RIS reference:** | **Comments:** |
| 2.4 What measures are already in place to control PFOS? | Taking effect from December 2017, Defence published the Pollution Prevention Management Manual, which precludes the procurement of any AFFF products that contain PFOS or PFOA as an active ingredient. This policy is consistent with Option 4, should the Australian Government decide to ratify the Stockholm Convention, and as such this policy would be consistent with Australia’s ratification.obligations. |
| 2.5.2 Metal plating and plastics etching | Defence predominantly procures chrome plating services from industry. If the use of PFOS-based mist suppressants is disallowed, the expectation is that industry will comply with the direction and modify their practices accordingly. The activities that Defence undertakes in chrome plating are performed in a closed-loop system.  Chromium VI plating process is essential for hard metal plating applications, and that products used in this process contain PFOS or PFOS-related chemicals. Feedback has flagged concerns that PFOS-free mist suppressants may not perform as well as PFOS-based mist suppressants. Additionally, the financial impacts of transitioning to PFOS free mist suppressants are still not well understood.  Despite this, feedback has also indicated that no major impact on capability can be foreseen if a transition occurs. Defence believes the transition to a mist suppressant not containing PFOS or PFOS-related ingredients could pose a potential problem, but the scale and impact will require further investigation and the associated risk is considered acceptable. |
| 2.5.3 Fire fighting | Defence’s policy on the acquisition of fire fighting foams is consistent with Australia’s obligations, should Australia ratify the Stockholm Convention.  From 2004, the Department of Defence commenced phasing out its use of legacy AFFF products containing PFOS and PFOA as active ingredients and progressively transitioned to a more environmentally safe product called Ansulite.This is an AFFF which does not contain PFOS or PFOS-related chemicals as active ingredients. Ansulite is used in emergency situations where human life is at risk, or in controlled environments to test equipment. Any Ansulite used for testing is captured and treated and/or disposed of at licensed waste disposal facilities. Defence considers the use of this product to be important to its core principle of defending Australia and its national interests, as it is a highly effective product and, crucially, meets United States Military Standards (MIL-SPEC) interoperability requirements when used by the Australian Defence Force.  Defence is phasing out legacy fire fighting foams by banning their use and progressively disposing of stocks of AFFF containing PFOS and PFOS-related chemicals as active ingredients. Ratification of the Stockholm Convention will not affect the use of older fire fighting foams as a result.  Defence is satisfied that ratification of the Stockholm Convention will not impact its fire fighting capabilities. |
| 2.5.4 Photographic materials | Defence uses some PFOS and PFOS-related chemicals for essential photographic capabilities. Defence possesses a range of X-ray materials that contain PFOS and PFOS-related chemicals, used to test metal items for internal defects (such as welds and engine components). PFOS and PFOS-related chemicals are contained in the coating matrix of the X-ray film and bound to the components of the matrix. As this is considered an essential use of the chemicals, the ongoing use of PFOS and PFOS-related chemicals for X-ray photo imaging is permitted under all 4 proposed options described in the RIS, so Defence capability will not be impacted in this regard.  Even noting this, it is likely that Defence will transition to digital radiography, which does not require film, estimated within the next 5 years. |
| 2.5.5 Other potential uses of PFOS for which information is sought | All Aviation Hydraulic Fluids currently held by, and supplied to, Defence are PFOS-free.  Defence owns and procures charge coupled device (CCD) scopes (gastroscopes, colonoscopes, image intensifiers and bronchoscopes), used for medical imaging. All newly acquired CCD scopes are expected not to contain PFOS or PFOS-related chemicals.  The Australian Pesticides and Veterinary Medicines Authority advises that there is no evidence PFOS or PFOS-related chemicals occur in any pesticide products used in Australia.  All oils and lubricants categorised as a hydraulic fluid in the Petroleum Oils and Lubricants Handbook (DEFAUST 206F maintenance standard for Defence) have at least one product available for each application that does not contain PFOS or PFOS-related chemicals. |