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| General/overall comments |
| Hunter Water strongly supports Option 4 as the most suitable and cost-effective solution to protect the environment and public health. Hunter Water has in recent years been exposed to unregulated PFAS compounds (including PFOS and its salts) entering the environment and impacting on part of our water supply catchment; and in muncipial wastewater which ultimately enters the environment, particularly in biosolids products. This includes industrial point-sources of PFAS that are not related to fire fighting foams, as well as the ubiquitious, lower-concentration PFAS contamination of sewage coming from households and businesses. Monitoring of 28 PFAS compounds in wastewater plants demonstrates the widespread distribution of PFAS contamination in human settlements as well as the persistence of the compounds.  Based on the information provided, Options 2 and 3 have substantial unidentified costs to the water and wastewater industries; for example to demonstrate the suitability of PFOS-contaminated biosolids products for agricultural reuse, and to demonstrate that sewer systems are not being used as disposal routes for PFOS contaminated materials.  There are hundreds of known, detectable PFAS compounds and phasing out one group (PFOS and it’s related compounds) is likely to lead to increased use of other groups that have similar chemical properties and/or carry out the required function. For example, short-chain PFAS compounds are being used as a replacement for PFOS and its related compounds, and their chemical structure indicates that these compounds are also extremely stable in the environment, and therefore may pose similar human and envrionmental risks as PFOS, but such risks are as yet poorly understood. Therefore it will be important for the phase-out program to include surveillance for other PFAS chemicals being used as replacements for PFOS and its related compounds. |