



Sara Broomhall
National Coordinator for the PFAS NEMP
Heads of EPA Australia and New Zealand Australian Government
Department of Climate Change, Energy, the Environment and Water
Sara.Broomhall@awe.gov.au

28 October 2022

Re: Request for extension to the consultation period for the draft PFAS NEMP 3.0

Dear Sara,

The Queensland Water Directorate (*qldwater*) is the central advisory and advocacy body within Queensland's urban water and sewerage services industry, providing a collaborative hub for its members to provide safe, secure and sustainable urban water services to Queensland communities. Our members include all local government and local government-owned water service providers in the state comprising: 52 local councils, 17 indigenous councils and two council-owned statutory authorities in South East Queensland. These water service providers range the full spectrum of scale: from the smallest with 137 water connections, to the largest with 664,000 connections.

Following the official release of the draft PFAS NEMP 3.0 on the 23 September 2022, we have now had the opportunity and time to evaluate the document. The initial evaluation has led us to consider the extent and nature of the proposed limits and its impact for the urban water sector. Based on this evaluation we recognise that the guidance on limits poses a significant risk to the sustainability and practicality of current and planned operations for our sector, and ultimately on water service providers' ability to cost effectively provide an essential service for their communities.

To best respond and provide constructive input aligned with the principles of the NEMP, it is vital that the sector position and responses are developed based on a scientific review and assessment process. To be able to do this, the current consultation period is unrealistic to provide constructive feedback through a meaningful consideration and review of the draft PFAS NEMP 3.0. Furthermore, it is essential that consultation is undertaken with the water service providers *qldwater* represents, which are widely dispersed, remote and poorly resourced to assess the impact of the NEMP on their communities. The implications for decisions relating to the PFAS NEMP are likely to be far-reaching, impacting many sectors including waste, recycling, water, and agriculture; with the potential to disrupt circular economy outcomes.

Level 1, 6 Eagleview Place
Eagle Farm QLD 4009
07 3632 6850
enquiry@qldwater.com.au
www.qldwater.com.au

an initiative of
Institute of Public Works Engineering Australasia, Queensland
Local Government Association of Queensland
Local Government Managers Australia
Australian Water Association

A BUSINESS UNIT OF
Queensland
 **IPWEA**
INSTITUTE OF PUBLIC WORKS
ENGINEERING AUSTRALASIA



The request is for the extension of the consultation period from the 20th of December 2022 to 4pm on the 28th of February 2023 (AEDT).

Should you have any further queries, please do not hesitate to contact Dr Louise Reeves, Program Research Coordinator of the Queensland Water Directorate via (07) 3632 6856 or lreeves@qldwater.com.au.

Yours faithfully,

A handwritten signature in brown ink that reads 'Linda Roberts'.

Linda Roberts
Interim Chief Executive Officer
Queensland Water Directorate

Level 1, 6 Eagleview Place
Eagle Farm QLD 4009

07 3632 6850

enquiry@qldwater.com.au
www.qldwater.com.au

an initiative of
Institute of Public Works Engineering Australasia, Queensland
Local Government Association of Queensland
Local Government Managers Australia
Australian Water Association

A BUSINESS UNIT OF

