

s 9(2)(a)

Stuff Media

s 9(2)(a)

Dear s 9(2)(a)

Thank you for your request for information under the Official Information Act 1982 (OIA), including the PFAS All of Government weekly reports, specifically those dated 6, 13, 20 and 27 August 2018.

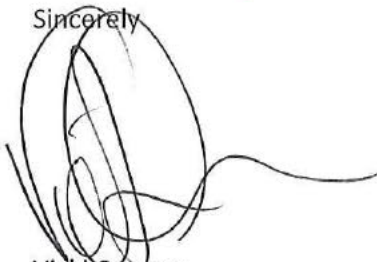
This request was received by the New Zealand Defence Force, and transferred to the Ministry for the Environment under section 14 of the OIA on 15 October 2018.

The document dates given were not accurate, and therefore it has been assumed, in consultation with the Ministry Executive Relations Team, that the documents requested pertain to those dated 10, 17, 24 and 31 respectively.

Part of the information you have requested is enclosed. The attached table lists the documents falling within the scope of your request, as it relates to the Ministry for the Environment, and notes any OIA provisions that have been applied. This is primarily to withhold the contact details of staff members and the names of individuals outside of the Ministry, as well as maintain legal professional privilege and effective conduct of public affairs through free and frank discussion.

Under section 28(3) of the OIA, you have the right to ask the Ombudsman to review my response to your request. Information about how to make a complaint is available at www.ombudsman.parliament.nz or Freephone 0800 802 602.

Sincerely



Vicki Connor
Director
Communications and Engagement

List of documents

Document no.	Document date	Content	Decisions	OIA sections applied
1	10 August 2018	Weekly PFAS Situation Update	Released in part	S9(2)(h) S9(2)(a)
2	17 August 2018	Weekly PFAS Situation Update	Released in part	S6(c) S9(2)(a)
3	24 August 2018	Weekly PFAS Situation Update	Released in part	S9(2)(i)
4	31 August 2018	Weekly PFAS Situation Update	Released in part	S9(2)(a) S6(c)

Released under the provision of
the Official Information Act 1982



To Hon David Parker, Minister for the Environment and To Hon Eugenie Sage, Associate Minister for the Environment To Hon David Clark, Minister of Health To Hon Ron Mark, Minister of Defence To Hon Damien O'Connor, Minister of Agriculture, Biosecurity, Food Safety, and Rural Communities To Hon Phil Twyford, Minister of Transport			Tracking #: 2018-B-04819
			
<u>Security Level</u>	Sensitive	Number of Attachments	0
Date Submitted:	10.08.2018	Response needed by:	N/A
MfE Priority:	Non-Urgent	Action Sought:	Noting/Decision

Weekly PFAS Situation Update

Purpose

1. This briefing provides you with the PFAS update for the week ending 10 August 2018.

Situation update

2. Sampling near Base Whenuapai is ongoing. Ground and surface water samples have been taken, along with sediment and other marine biota. Due to tidal conditions, sampling may not finish for up to two weeks. Results are expected in mid-September, and the New Zealand Defence Force is working with Auckland Council.
3. Results from sampling at a RNZAF Skyhawk crash site in the Rangitikei District are expected next week.
4. Details of Ohakea residents seeking PFAS blood serum tests have been provided to the Ministry of Health, to facilitate the testing with local GPs.
5. The All of Government Programme is working with Taranaki Regional Council on their investigation into PFAS. Elevated levels of PFAS was found in eels from the Oaonui and Ngapirau Streams in South Taranaki. The Ministry for Primary Industries has provided advice on consumption of food from watercourses where PFAS has been detected. The Environmental Protection Authority has been contacting a range of installations, including oil facilities, regarding any non-compliant foam stocks they may have.
6. Elevated levels of PFAS have also been detected in groundwater at five sites. In each case, the groundwater is not known to be used to supply water for human or stock consumption, so there are no direct pathways for human health risk. The Associate Minister for the Environment has requested further information on the Taranaki sites, which has been attached as Appendices One and Two.

- 7. Fire and Emergency New Zealand is continuing the assessment of its operational sites for potential PFAS contamination. Site information and risk scores from the top priority sites identified during the initial screening have been provided to the Ministry for the Environment. So far, no locations have been identified of immediate concern for human health.

Meetings

- 8. An Ohakea committee meeting with Manawatū District Council is planned for Tuesday 14 August. Representatives from the All of Government Programme, and Phil Pennington from Radio New Zealand, have been invited by the committee.

- 9. s 9(2)(h)


Media and communications

- 10. Media coverage in the past week has focused on Taranaki Regional Council's notification of elevated levels of PFAS found in eels in two streams in south Taranaki, and of PFAS found in groundwater at five sites. The Council began engaging with iwi and the local community before the testing was conducted.
- 11. The Environmental Protection Authority has issued a media release regarding its Investigations into Shell in Taranaki, attached as Appendix Three.

OIA requests

- 12. No new OIA requests have been received by the All of Government Programme.

Recommendations

- 1. We recommend that you:
 - a. **Note** the contents of this briefing

Yes/No

Signature



Neil Hurley
Director/Chief Information Officer
Organisational Performance and Operations

10.08.18

Date

Hon David Parker
Minister for the Environment

Date

Hon Eugenie Sage
Associate Minister for the Environment

Date

Hon David Clark
Minister of Health

Date

Hon Ron Mark
Minister of Defence

Date

Hon Damien O'Connor
**Minister for Agriculture, Biosecurity,
Food Safety, and Rural Communities**

Date

Hon Phil Twyford
Minister of Transport

Date

Ministry for the Environment contacts

Position	Name	Cell phone	1 st contact
Principal author	Reed Inwood		
Programme Manager	Nigel Shatford	s 9(2)(a)	✓
Director/Chief Information Officer Organisational Performance and Operations	Neil Hurley	s 9(2)(a)	

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Official Information Act 1982

Appendix One – Ministerial Questions and Answers

- **Can an overview of who is alerted and their responsibilities when PFAS is found be prepared?**

The All-of-Government National PFAS Programme, led by the Ministry for the Environment (MfE), is overseeing and co-ordinating the response to PFAS contamination in New Zealand. It's members include the Ministry for Primary Industries, Ministry of Health, the Environmental Protection Authority, the New Zealand Defence Force and Fire and Emergency New Zealand. The all of Government Programme, led by MfE is currently working through a prioritisation exercise to identify sites for further investigation by Regional Councils, and is making contact with Regional Councils and Territorial Authorities, as appropriate.

The role of the Ministry for Primary Industries and the Ministry of Health is to provide advice on any possible health or food safety issues.

The EPA are investigating the use of non-compliant firefighting foams under the HSNO Act as the responsible regulator, and ensuring appropriate disposal of these foams.

The New Zealand Defence Force and Fire and Emergency New Zealand are investigating their own sites where firefighting foams containing PFAS compounds have historically been used, with oversight for the All of Government Programme.

Regional councils are regulators for the purposes of contaminated land under the Resource Management Act, and are working with iwi, residents and industries in their areas when sites of concern are identified.

The All of Government programme has prepared a roles and responsibilities document that can be found on our website.

<http://www.mfe.govt.nz/sites/default/files/media/Land/Roles%20and%20responsibilities%20d%2026%20July%202018.pdf>

- **Was the public alerted to the presence of the PFAS at/near the Shell tank farm site and in groundwater in Taranaki?**

Taranaki Regional Council have undertaken sampling at a range of locations around Taranaki. Prior to undertaking sampling, they provided an information pamphlet to residents informing them of the situation (attached) starting on the 6th of July. The results of this sampling were received late last week, and TRC have been contacting and working with affected industries, iwi, landowners and the public since that time.

- **How does contamination near the Shell tank farm (in waterways and eels for example) compare with that in the environment close to other sites where PFAS has been found?**

While some PFAS was detected in groundwater near the site, the Shell tank farm on the outskirts of New Plymouth has not been a focus of Taranaki Regional Council (TRC) surface water investigations.

TRC has sampled mussels collected at a number of points around the Taranaki coastline, including from in the vicinity of the stream mouth near the Oaonui hot fire training facility, Port Taranaki and the tank farms, the Waiwhakaiho River mouth (New Plymouth WWTP outfall), Waiongana river mouth (flowing past the old hot fire training facility at NP airport), and Waitara river mouth.

No PFAS compounds were detected.

Limited information is available to compare the concentrations found, however the concentration of PFOS detected in the Eel sampled at Oaonui stream is of concern.

- **Were Ministers alerted to the presence at the Shell tank farm site, and if so when? Please provide copies of the reports**

The All of Government programme noted in the PFAS Weekly Briefing for the week ending 6 July 2018 (18-B-04732) that Taranaki Regional Council were undertaking investigations and providing landowners at Oaonui with an information newsletter; the results of the investigations were reported in the PFAS Weekly Briefing for the week ending 3 August (18-B-04799).

- **How many other sites around NZ are agencies aware of where PFAS has been found, and the sites are not in the public domain? Where are they and what are the plans to alert the public and provide any warnings where required?**

Industrial and commercial users of firefighting foams such as airports, ports, oil terminals, NZDF, and Fire and Emergency NZ are undertaking their own investigations on their sites and may have also undertaken testing to determine levels of PFAS in and around their sites.

When these sites become alerted to the All of Government Programme, Ministers are alerted through the Weekly Briefing (supported by other appropriate channels), and the All of Government Programme engages with the Regional Council as the regulator who can coordinate the local response (for example, when the sites in Taranaki came to our attention). If necessary, the All of Government Programme could assist with alerting the local community, but this is generally led by the Regional Council, as the most appropriate party to do so.

MfE, as lead agency of the All of Government programme, is providing up to date information on our website. This is linked to other agencies advice as appropriate.

Councils are also providing newsletters, website updates and meetings with their impacted communities as required.

PFAS compounds are used in a wide variety of industrial and commercial applications including: as a surfactant component of specialised foams for fighting flammable liquid fires, in the manufacture of Teflon, in waterproof clothing, in furniture protectants, carpet manufacture, polishes and waxes, cosmetics, building materials, electronics, metal plating industries, and food packaging. Most people are exposed to low background levels of PFAS compounds in their daily lives through contact with food, dust, air and water and consumer products. Most people have small amounts of these substances in their systems and this is not known to cause a health risk.

Councils around the country are looking into potential sites of interest where PFAS compounds may have entered the environment. These include areas where firefighting foams have been used (airports, training sites, oil terminals etc); industrial sites that use PFAS compounds (metal plating industries, textile industries etc); and locations that PFAS compounds have been disposed and/or enter the environment (landfills, wastewater treatment plants).

Sites where non-foam use of PFAS could be of concern has been recently highlighted in Tonkin & Taylor report, paid for in part by MfE. It can be found through the link below:

<http://www.mfe.govt.nz/sites/default/files/media/Hazards/Tonkin&Taylor%20Non%20foam%20PFAS%20sources%20-%20FINAL.pdf>

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Appendix Two - Taranaki Regional Council information sheet July 2018

To Oaonui/Sandy Bay residents

The Taranaki Regional Council is investigating contamination of groundwater at Oaonui arising from historical activities at the Hot Fire Training Facility on Te Tai Road, operated by Wood Group. We believe you have a right to first-hand, reliable information and shouldn't have to rely on speculation or comment that may not be based on all the facts.

Most importantly, there is no known health risk to you or your stock. This flyer explains why.

What is the situation?

- Sampling of groundwater beneath the Hot Fire Training Facility has found contamination above levels deemed safe for human consumption. The contaminants of concern are particular chemicals from within a larger chemical family known as PFAS, which were used as a constituent of specialised firefighting foam.
- The testing has found a contamination 'hot spot' extending 100m from the site.
- Further investigations are being carried out.
- PFAS foam has not been used at the Hot Fire Training Facility since 2016, when an abatement notice was serviced on the operator by the Council after minor surface foaming during rain was noticed in a drain. More recent sampling of the Oaonui Stream has revealed no PFAS contamination.
- The Council is also working closely with the Māui Production Station operator, Shell Taranaki Limited, whose sampling has revealed a degree of PFAS contamination in the Ngapirau Stream, to the south of Oaonui. Further sampling is being carried out.

Is there a risk to residents and/or stock?

- As far as the Council is aware, neither the contaminated groundwater nor the Oaonui or Ngapirau streams are used to supply any water to households or stock. Nor are food supplies harvested from in or near the stream. Accordingly, there is no known threat to human health or stock.

Is more information available?

- The Ministry for the Environment website has information and Q&As on PFAS: www.mfe.govt.nz/more/hazards/hazardous-substances/pfas/about-pfas
- If you have specific questions about the situation at Oaonui, contact Gary Bedford, the Council's Director-Environment Quality. Call 0800 736 222 or email gary.bedford@trc.govt.nz

We will keep you updated on any further developments.

Appendix Three – EPA Media Release

Media Release

Fire-fighting foam investigation

9 August 2018

The Environmental Protection Authority (EPA) is not aware of any evidence that fire-fighting foams manufactured using PFOS or PFOA continue to be discharged into the environment, as recently reported by news outlets.

“We want to allay public concerns around such reports, because we have not found any evidence that this is the case,” says Dr Fiona Thomson-Carter, the EPA’s general manager of Hazardous Substances and New Organisms.

“Our initial focus was on airports around New Zealand, where such foams may have been used historically for firefighting training and responding to emergencies. However, as part of our ongoing investigation, with are talking with managers at a range of installations, including oil facilities.

“There are only a very small number of places within New Zealand where these foams can be found and we are working with them to check that their storage arrangements ensure environmental safety. Provided the foams are appropriately stored, they pose no immediate risk to people or the environment.”

“Our aim is to ensure facilities with these foams comply with the regulations, and the firms involved are being highly co-operative,” Dr Thomson-Carter says.

The EPA is also checking that adequate measures are being taken regarding safe disposal of non-compliant foams, by ensuring they are properly exported from New Zealand for safe destruction.

Further information

Michael Pearson

021 966085

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To Hon David Parker, Minister for the Environment and To Hon Eugenie Sage, Associate Minister for the Environment To Hon David Clark, Minister of Health To Hon Ron Mark, Minister of Defence To Hon Damien O'Connor, Minister of Agriculture, Biosecurity, Food Safety, and Rural Communities To Hon Phil Twyford, Minister of Transport			Tracking #: 2018-B-04838
<u>Security Level</u>	Sensitive	Number of Attachments	0
Date Submitted:	17.08.2018	Response needed by:	N/A
MfE Priority:	Non-Urgent	Action Sought:	Noting

Weekly PFAS Situation Update

Purpose

1. This briefing provides you with the weekly PFAS update for the week ending 17 August.

Situation update

2. Sampling in Whenuapai is expected to be completed this week, conditions permitting.
3. In its Regional Plan the Northland Regional Council has proposed limits around groundwater leaching of PFAS – this will go to hearing next month. The values that they have used are consistent with current advice, although they may be subject to future change.
4. The Environmental Protection Authority is planning to review the Group Standard for Fire Fighting Chemicals (which prohibits the use of firefighting foams containing PFOS and PFOA). A workshop with stakeholders is planned in early October to discuss fluorinated vs fluorine free foams, operational guidance in the Standard, and other issues.
5. The Environmental Protection Authority also intends to review its other regulatory instruments to ensure they are fit for purpose.

National work stream update

6. s 6(c)



s 6(c)

Meetings

7. Representatives from the Environmental Protection Authority are attending a working group on the revision of the PFAS National Environmental Management Plan in Melbourne on 16 August. They are also attending a Heads of Environmental Protection Authorities Emerging Contaminants Workshop, in Australia, which will discuss recent developments in the assessment and management of emerging contaminants and look to develop options for a consistent approach for emerging contaminants. A further update will be provided.

Ministerial requests

8. Information for the previously reported ministerial request for s 9(2)(a) from Task Protection Services has been provided to Minister Parker's office.

Media and communications

9. Media attention over the past week has focussed on the Taranaki Regional Council's announcement of PFAS detections in two streams, low levels of PFAS being detected at the Marsden Refinery, and blood tests for Ohakea residents.

OIA requests

10. Three OIA requests have been received by the All of Government Programme:
 - a. A request from Hon. Simpson's office for the Cabinet Paper on the PFAS Programme for March. This was directed to the proactively released copy on the Ministry for the Environment's website.
 - b. A request from s 9(2)(a) (reporter for Stuff) for most PFAS Weekly Briefings for the months of May and June, as well as the Update on Proposed Ohakea Water Scheme briefing. This is being processed, with an extension due to cross agency consultation requirements.
 - c. A request from s 9(2)(a) (reporter for Radio NZ) for the PFAS Weekly Briefings for the months of June, July and August to present (up to the 3 August Briefing).
11. s 9(2)(a) has also requested information from Regional Councils regarding investigations they have undertaken in their region and the results.

Recommendations

- 1. We recommend that you:
 - a. **Note** the contents of this briefing

Yes/No

Signature



Neil Hurley
Director/Chief Information Officer
Organisational Performance and Operations

17.08.18

Date

Hon David Parker
Minister for the Environment

Date

Hon Eugenie Sage
Associate Minister for the Environment

Date

Hon David Clark
Minister of Health

Date

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Hon Ron Mark
Minister of Defence

Date

Hon Damien O'Connor
**Minister for Agriculture, Biosecurity,
 Food Safety, and Rural Communities**

Date

Hon Phil Twyford
Minister of Transport

Date

Ministry for the Environment contacts

Position	Name	Cell phone	1 st contact
Principal author	Reed Inwood		
Programme Manager	Nigel Shalford	s 9(2)(a)	✓
Director/Chief Information Officer Organisational Performance and Operations	Neil Hurley	s 9(2)(a)	

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To Hon David Parker, Minister for the Environment and To Hon Eugenie Sage, Associate Minister for the Environment To Hon David Clark, Minister of Health To Hon Ron Mark, Minister of Defence To Hon Damien O'Connor, Minister of Agriculture, Biosecurity, Food Safety, and Rural Communities To Hon Phil Twyford, Minister of Transport			Tracking #: 2018-B-04851
			
<u>Security Level</u>	Sensitive	Number of Attachments	0
Date Submitted:	24.08.2018	Response needed by:	N/A
MfE Priority:	Non-urgent	Action Sought:	Noting

Weekly PFAS Situation Update

Purpose

1. This briefing provides you with the PFAS update for the week ending 24 August 2018.

Situation update

2. Whenuapai testing has been completed, with results due mid-September. Stage 4 testing at Ohakea and Woodbourne is scheduled to commence in mid-late September.
3. The All of Government programme is meeting with Council and Iwi representatives in Taranaki on Thursday 30 August.
4. The Environmental Protection Authority attended the Heads of the Environmental Protection Authorities National Chemicals Working Group in Melbourne on Thursday 16 August. The Working Group discussed updates to the PFAS National Environmental Management Plan, which informs PFAS work in New Zealand.

Media and communications

5. There has been limited media coverage this week, with no new story angles reported.

OIA requests

6. Another OIA request from s 9(2)(a) (reporter for Stuff) has been received. The scope is for the title and date of all reports and briefings sent to the Minister for the Environment since 2 July 2018.

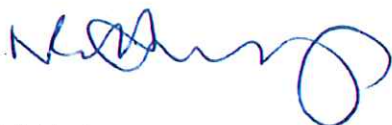
Recommendations

1. We recommend that you:

- a. **Note** the contents of this briefing

Yes/No

Signature



Neil Hurley
Director/Chief Information Officer
Organisational Performance and Operations

24.08.18

Date

Hon David Parker
Minister for the Environment

Date

Hon Eugenie Sage
Associate Minister for the Environment

Date

Hon David Clark
Minister of Health

Date

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Hon Ron Mark
Minister of Defence

Date

Hon Damien O'Connor
**Minister for Agriculture, Biosecurity,
 Food Safety, and Rural Communities**

Date

Hon Phil Twyford
Minister of Transport

Date

Ministry for the Environment contacts

Position	Name	Cell phone	1st contact
Principal author	Reed Inwood		
Programme Manager	Nigel Shatford	s 9(2)(a)	✓
Director/Chief Information Officer Organisational Performance and Operations	Neil Hurley	s 9(2)(a)	

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To Hon David Parker, Minister for the Environment and To Hon Eugenie Sage, Associate Minister for the Environment To Hon David Clark, Minister of Health To Hon Ron Mark, Minister of Defence To Hon Damien O'Connor, Minister of Agriculture, Biosecurity, Food Safety, and Rural Communities To Hon Phil Twyford, Minister of Transport			Tracking #: 2018-B-04851
			
<u>Security Level</u>	Sensitive	Number of Attachments	0
Date Submitted:	31.08.2018	Response needed by:	N/A
MfE Priority:	Non-urgent	Action Sought:	Noting

Weekly PFAS Situation Update

Purpose

1. This briefing provides you with the PFAS update for the week ending 31 August 2018. An overall programme update is included as the Appendix.

Situation update

2. The All of Government programme met with Councils, health officials and representatives from Iwi, the community, and the oil industry in Taranaki on Thursday 30 August. The discussion was of information sharing of the work undertaken in Taranaki to date, an overview of what the gathered data means, and the roles and responsibilities of agencies, councils and landowners.
3. The initial results of groundwater from the recently completed testing by the New Zealand Defence Force around Whenuapai Air Base have been delivered to landowners. No issues were identified from the initial results. Remaining testing results including surface water and biota samples are still being analysed and are expected by 24 September 2018.
4. The All of Government programme is progressing the recommendations made in the 'Non fire-fighting foam sources of PFAS contamination in New Zealand' scoping study. On 28 August the Ministry and Environment Canterbury (as the convener of the Regional Waste and Contaminated Land Special Interest Group) discussed how they could provide a New Zealand picture on typical PFAS concentrations in influent and effluent at waste water treatment plants and leachate from landfills.

Media and communications

5. Radio New Zealand ran a Checkpoint feature story on PFAS contamination around Ohakea, including interviews with members of the Ohakea Contaminated Water Committee. Radio New Zealand also carried reports on the New Zealand Defence Force's engagement with the Australian Defence Force when PFAS contamination was discovered at Ohakea in 2015.

OIA requests

- 6. No new OIA requests have been received by the Ministry. Greenpeace and Radio New Zealand have requested information from the Environmental Protection Authority relating to correspondence with Shell New Zealand/ Shell Taranaki and their use of PFOS.

Recommendations

- 1. We recommend that you:
 - a. **Note** the contents of this briefing

Yes/No

Signature



Neil Hurley
Director/ Chief Information Officer
Organisational Performance and Operations

31.08.18

Date

Hon David Parker
Minister for the Environment

Date

Hon Eugenie Sage
Associate Minister for the Environment

Date

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Hon David Clark
Minister of Health

Date

Hon Ron Mark
Minister of Defence

Date

Hon Damien O'Connor
**Minister for Agriculture, Biosecurity,
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Date

Hon Phil Twyford
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Date

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Programme Manager	Nigel Shatford	s 9(2)(a)	✓
Director/ Chief Information Officer and Organisational Performance and Operations	Neil Hurley	s 9(2)(a)	

Appendix

PFAS National Programme overview

Background

PFAS is an acronym for a group of several thousand chemical compounds known as per- and poly-fluoroalkyl substances. They are a ubiquitous group of water repellent, stain resistant, and non-stick chemicals we have been using in our daily lives since the 1950s.

In New Zealand, two of the PFAS compounds, PFOS and PFOA, were used in firefighting foams for over 50 years until these foams were banned in 2006. They have been used for flammable liquid fires at airports and fire training sites across New Zealand. In these situations they were often used in open spaces, on bare ground and at high volumes. PFAS is highly mobile in the environment and these sites are an obvious first candidate for potential contamination of soils, surface water and groundwater.

The initial focus has been on fire training sites. In time, sites where non-foam uses of PFAS took place will be identified and investigated. Landfill sites and waste water treatment outfalls could well prove to be significant sources.

Early research papers on PFAS suggested links to diseases such as cancer, thyroid, cholesterol and reproduction issues and low birth weights. The latest health advice from Australia concluded there was little evidence to link PFAS exposure to human disease. Currently there is no consistent evidence that exposures to the low levels found in the New Zealand environment will cause harmful health effects. The All of Government programme has, however, adopted a precautionary approach for drinking water and recommended alternative water sources where the interim health guidance levels are exceeded.

The relevant legislation for the programme is the Resource Management Act 1991 (RMA) and the Hazardous Substances and New Organisms Act 1996 (HSNO). The day-to-day environmental management on contaminated land issues is largely the responsibility of regional councils and territorial authorities. HSNO creates a regime of controls for how hazardous substances are contained, labelled, stored, used, transported or disposed of. The RMA allows local authorities to manage the effects of the use of hazardous substances.

The All of Government PFAS Programme

The All of Government (AoG) PFAS Programme was established in response to the presence of PFAS chemicals in and around the New Zealand Defence Force's Airbases at Ohakea and Woodbourne. The Programme's role is to coordinate the government response to this emerging contaminant, including guidance, oversight and engaging with local government. The overall goal of the Programme is to provide information and guidance on how this emerging contaminant can be managed by councils and industry using the existing approaches to hazardous substances and contaminated land.

The main elements of the Programme are:

- Investigations on Crown sites
- EPA site investigations
- Working with local government
- Research and system improvements

Investigations on Crown sites

The New Zealand Defence Force has been investigating PFOS/PFOA around Defence sites across NZ, with an initial focus on the groundwater and soil in and around Base Ohakea and Base Woodbourne. Four rounds of testing are planned, with the final round due in September. Testing is also being undertaken in both Devonport and Whenuapai in Auckland. Once testing is complete, and the extent and seasonal variation of contamination is understood, response options will be considered.

EPA site investigations

The EPA has particular responsibility for enforcing the prohibitions in the HSNO Act on the use of PFAS chemicals that are internationally recognised as persistent organic pollutants under the Stockholm Convention. Currently this only applies in relation to PFOS, but PFOA and another PFAS chemical, PFHxS, have also been proposed for listing as Stockholm chemicals.

s 6(c)

Working with local government

The AoG Programme is working with local government to assist in carrying out their functions through providing information and coordination to ensure the response is consistent between councils. The Ministry is working with other central government agencies and local government to develop a toolbox of guidance and information. The Programme's governance and working group arrangements include local government representation.

The AoG Programme is also working with relevant industry groups around understanding the size and scale of the issue, and how we can work with them and councils. This includes the Airports Association, Water NZ and waste water treatment plant operators.

The AoG Programme has been conducting a prioritisation exercise to identify the sites, based on currently known information, that are likely to require further action.

Contamination has recently been identified in Taranaki as a result of activities carried out on a fire training site, as well as bulk petrochemical storage sites (Shell). While there has been some media coverage in this area, the programme has been in regular contact with the Taranaki Regional Council, which is leading this work as the responsible regulator. The Taranaki Regional Council has been proactive in addressing this matter.

Landowners have responsibilities under regulations for potentially contaminated land. The National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES-CS) includes requirements for contaminated land, including potential contamination caused by past land use. Resource consents may be required under the regulations.

The Hazardous Activities Industry List (HAIL) provides guidance on the industries and activities which typically use or have used or stored hazardous substances that, through improper management, could potentially cause contamination. If a council records or a preliminary site investigation indicates that a HAIL activity may have occurred, the NES-CS applies.

As a new contaminant, PFAS was not previously recognised as a hazardous substance and as such not all activities that used PFAS will be identified on council HAIL registers. The HAIL registers are, however, likely to capture the majority of sites where activities involving PFAS were used. In time, the HAIL list and individual council registers could require review.

Research and system improvements

The AoG Programme part-funded, with several regional councils, research into potential sources of PFOS/PFOA from non-foam sources. The Tonkin and Taylor report is available in full on the Ministry's website. The research indicated a number of potentially significant sources of PFAS in the environment, including:

- Waste water treatment plants
- Landfills
- Biosolids application
- Textiles, upholstery and leather manufacturing
- Metal plating and etching
- Paper products.

Cleaning out a fire truck of firefighting chemicals requires a significant volume of water and all this wash water needs to be properly treated and diluted in order to be accepted into the local trade waste and water treatment systems. As a new contaminant there are no criteria for the PFAS compounds. Some operators have temporarily adopted a zero standard for PFAS compounds (despite likely trace ambient levels already in the system) and this is creating uncertainty for fire truck cleaning activities and making it difficult to quickly reach compliance. The AoG Programme has been working hard with local government and trade waste operators to patch what is currently a gap in our waste water management system.

The AoG Programme is also closely engaged with officials in Australia as they work on an updated version of their National Environmental Management Plan for PFAS contamination.

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