To Lidia Thorpe,
Chair, select committee on PFAS (per and polyfluoroalkyl substances),

Three out of four members of my immediate family have cancers that are often attributed to environmental contaminants such as PFAS. This is one of the reasons that I have developed an interest in the issue of PFAS. I appreciate the opportunity to make a submission to the Senate Select Committee.

I wish to address a particular term of reference being (b) Sources of exposure to PFAS, including through environmental contamination, food systems and consumer goods. In addition, I wish to make a brief comment about the need for national regulation relating to the petrochemical industry, decommissioning and its relevance to PFAS.

I believe that on-shore decommissioning of offshore oil and gas rigs around the coast of Australia, including those in Bass Strait and Western Australia, are a potential future source of PFAS contamination to humans and the environment.

Australia has no purpose-built on-shore decommissioning facilities at present but it is recognised that they are urgently required. At issue is finding suitable industrial sites that are able to deal with the large quantities of contaminated waste, including PFAS, carried on these rigs. PFAS were extensively used historically in firefighting foams on gas and oil rigs. Barnacles and other marine life growing on and near the rigs are **highly likely to be contaminated with bioaccumulated PFAS.**

NOPSEMA states: "There is a need to characterise the sources, fates and consequences of all types of contaminants and pollutants (such as but not limited to...per-and polyfluoroalkyl substances (PFAS)) relevant to the lifecycle of petroleum activities to inform impact assessment and decision making relating to petroleum activity decommissioning and title relinquishment. " (1)

The Australian Government has committed to ensuring that the decommissioning process is fit for purpose and reflects best practice. (2).
We may fail at the first hurdle!

According to a report from Macquarie University, Norway is recognised as having the world's best practice at decommissioning of offshore rigs. They recognise the greater than ordinary hazards involved in the transport of the rigs over water onto land and the hazardous waste that is removed and processed on land. Norway provides clear, legally enforceable and uniform guidelines for such processes. Companies are required to submit decommissioning plans that include MANDATORY public consultation and detailed plans for all stages of the process, including recycling and the disposal of waste. Australia has NO such regulation in place. It was recommended that a titleholder be required to submit a detailed decommissioning plan that stipulates how all material will be recycled or disposed of. It warns that industry is unlikely to commit to such an undertaking without being required to by regulation. I understand that the regulation of hazardous materials is a responsibility of all levels of government, not just the states. (3)

This nightmare scenario of a precious ecosystem and food source at risk of being contaminated by PFAS is about to unfold in Corner Inlet in Gippsland, Victoria. A major petrochemical company has applied to the Victorian Government to decommission its retired Bass Strait rigs at Barry Beach Marine terminal in Corner Inlet, South Gippsland, in the middle of a Ramsar listed wetland, surrounded by Marine National Park and directly adjacent to Wilsons Promontory. A part of Corner Inlet is designated as a "sustainable fishery" and is recognised for its high economic and food value as a commercial fishery to Gippslanders and other Victorians. (4)

The petrochemical company involved has claimed that the provision of an EES is not needed because they have no plan to exceed current EPA guidelines for Corner Inlet! Yet,they provided no detail on how they will deal with the multiple contaminants they plan to blast off the rigs, nor how they will deal with the possibility of flooding in this inundation zone that drains directly into Corner Inlet. The plan is that huge rigs will be transferred from large ships onto barges just outside Corner Inlet, due to Corner Inlet being too shallow to accommodate large vessels. A few weeks ago, a fishing vessel was lost near Port Albert. These are hazardous waters.

The public is expected to take this corporation and its consultants at their word that they will deal with PFAS and other contaminants correctly and safely, despite their terrible track record with PFAS contamination in other areas of Gippsland, such as Longford, near Sale. The ABC has published several articles on this issue.

Even with world's best practice, Norwegian decommissioning facilities have destroyed fisheries by pollution caused by their decommissioning activities. Norwegians are currently discussing the question of liability for such pollution.(5)
Case histories show that a "zero leakage guarantee" offered by suppliers of geomembranes and believed by owners and engineers, can lead to catastrophic failure. (6)
According to the Centre of Decommissioning Australia (CODA), a site that is close to both recycling and a range of waste facilities must be found.(7)

Australia urgently needs to regulate such facilities in a uniform manner so that such decommissioning facilities can be developed that are as safe as humanly possible. Decommissioning facilities must not be allowed to contribute to the enormous PFAS contamination issue we already have. Regulation must not be left to state governments but needs to be dealt with as a national issue.
It is clear that Australia needs to find suitable sites for oil and gas decommissioning but that they must NEVER be close to environmentally sensitive or food producing areas, due to the risk of contamination by PFAS and other hazardous materials.

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