Select Committee on PFAS (per and polyfluoroalkyl substances)
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Canberra ACT 2600

Dear Committee

The level of PFAS in residential drinking water in NSW now appears to be tested by individual water supply companies, with reference ranges measured according to Australian Drinking Water Guidelines (ADWG). The results show that drinking water in areas without any known sources of PFAS contamination still contain PFAS.

However the National Health and Medical Research Council (NHMRC) ADWG values for PFAS contamination should not be treated as acceptable because PFAS bioaccumulates in the human body. Therefore the reasons for the widespread low levels of PFAS contamination in geographically diverse sources of Australian drinking water should be investigated and all water supply companies should be obligated to invest in PFAS removal infrastructure.

It is also notable that many of the methods used to remove PFAS from drinking water also remove artificial sources of fluoride. Most Australian drinking water is fluoridated using hydrofluosilicic acid, sodium silicofluoride, or sodium fluoride that is sourced from phosphate fertilizer manufacturers[1] and is often of overseas origin.[2] Water supply companies may not independently test these fluoridating compounds for impurities (e.g. heavy metals) before adding the chemicals to the water supply, while the Therapeutic Goods Association (TGA) also do not regulate water fluoridation.[3]

Recommendations

1. Water supply companies should test fluoride sources for PFAS contamination and/or test the water supply for PFAS levels *before and after* the addition of fluoride chemicals to rule it out as a possible source of PFAS contamination.
2. PFAS levels in drinking water should be regularly tested/audited by an independent agency.
3. Given the high costs of maintaining water fluoridation infrastructure, there should be comparative investment in PFAS removal systems – particularly given that recent Cochrane evidence shows that historical levels of reported benefits of fluoridated water have now declined.[4],[5]

[1] NSW Health (2015). Water Fluoridation: Questions and Answers. https://www.health.nsw.gov.au/environment/water/documents/fluoridation-questions-and-answers-nsw.pdf
[2] E.g. see Seqwater fluoridation of water supply fact sheet: 'Where is the fluoride sourced?' (Shanghai, China). https://www.seqwater.com.au/results?query=fluoride
[3] Dr Donna-Louise McGrath, Sub 37.1 (fluoridation) Provision of and Access to Dental Services in Australia, https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Dental_Services_in_Australia/DentalServices/Submissions?main_0_content_1_RadGrid1ChangePage=2_20
[4] Iheozor-Ejiofor Z, Walsh T, Lewis SR, Riley P, Boyers D, Clarkson JE, Worthington HV, Glenny A-M, O'Malley L. Water fluoridation for the prevention of dental caries. Cochrane Database of Systematic Reviews 2024, Issue 10. Art. No.: CD010856. DOI: 10.1002/14651858.CD010856.pub3. Accessed 30 August 2025.
[5] Dr Donna-Louise McGrath, (n3)