



**Reducing
workplace
harm.**

**Improving
outcomes for
injured workers.**

WorkSafe Ref: WSV25-2869

Senator Lidia Thorpe
PO Box 6100
Senate
Parliament House
CANBERRA ACT 2600

By email: PFAS.sen@aph.gov.au

Dear Senator Thorpe

Thank you for your request of 5 June 2025 to provide a written responses as part of the ongoing inquiry by the Senate Select Committee on PFAS (per and polyfluoroalkyl substances).

As requested, WorkSafe Victoria's response to items taken on notice during the Senate Select Committee hearing on 4 June 2025, including the provision of reports, is enclosed in a separate document.

Does WorkSafe recognise PFAS as a hazardous substance?

PFAS is a group of chemicals. Some chemicals of that group, in their concentrate form, would be a hazardous substance as defined in the Victorian *Occupational Health and Safety Regulations 2017* (OHS Regulations), as would some chemical mixtures that contain a PFAS chemical. However, residual PFAS found in areas such as soil, water or internal pipelines, is not regarded as a hazardous substance as defined in the OHS Regulations.

For WorkSafe to require employers to take action to control risks to employees and others, it must be satisfied that the substance is a potential risk in the specific circumstances.

In 2017, the Australian Government convened an independent expert health panel, with representatives from environmental health, toxicology, epidemiology and public health. The panel considered the evidence available from both Australian and international scientific research as well as the views of the public in forming its advice to the Government.

In handing down the report on 7 May 2018, Australia's Chief Health Medical Officer stated the panel had concluded there is mostly limited, or in some cases no, evidence that human exposure to PFAS is linked with human disease. The panel noted there is "no current evidence that suggests an increase in overall cancer risk" and that much of the evidence available is weak and inconsistent and decisions to minimise exposure to PFAS chemicals should be largely based on their known ability to persist and accumulate in the body. The panel advised the evidence does not support any specific screening or health interventions for highly exposed groups – except for research purposes.

The Chief Medical Officer confirmed the panel's findings support the Environmental Health Standing Committee's advice that there is no consistent evidence that exposure to PFAS causes adverse human health effects. However, given the chemicals continue to persist in humans and the environment, exposure to them should be minimised.

Based on these findings and the Chief Medical Health Officers statement, WorkSafe does not have evidence to support a health risk to require employers to implement controls. WorkSafe continues to monitor available evidence, including Commonwealth and Victorian health department guidance to ensure it is aware of the current risk status of PFAS-related substances.

Whose responsibility is it to address elevated PFAS blood levels in industrial workers and other highly exposed cohorts

Under Victoria's OHS legislation, there is no specific responsibility for any party to act on elevated PFAS blood levels in industrial workers or highly exposed cohorts of workers. There is a general duty under section 22(1)(a) of the Victorian *Occupational Health and Safety Act 2004* (OHS Act) for employers to monitor the health of employees. While this could be interpreted to include employers undertaking blood tests for PFAS, until there is evidence to support PFAS as a health risk, WorkSafe will not direct employers to take any action to monitor PFAS blood levels in workers.

This matter requires engagement with the respective Commonwealth, state and territory health authorities. Where practicable, Australia-wide consensus on this matter would enable a consistent response, noting that WorkSafe adopts the Commonwealth precautionary approach commonly adopted across jurisdictions.

Further work in public health would provide clarity and specification around workplace exposure limits. To regulate PFAS in the workplace, WorkSafe needs to understand, from a health perspective, what exposure thresholds lead to harm. This enables WorkSafe to provide a regulatory response once that threshold has been reached. In addition, established evidence-based interventions are required to address elevated PFAS blood levels.

Does WorkSafe have a comment on the current Federal enHealth health messaging that could better support employers to manage the health, safety and welfare of employees in relation to PFAS exposures?

WorkSafe considers Commonwealth guidance as to the health, safety and welfare risk posed by PFAS. We note that membership of enHealth includes representation by the Victorian Department of Health. We are guided by the Commonwealth and Victorian health departments as to the risk of PFAS to health, safety and welfare of persons, and apply this guidance to employees as persons.

Are there any international jurisdictions where PFAS exposure at work is handled differently to Australia? Are there lessons we could learn?

An appropriate response requires detailed review of international findings, their methodology and applicability to the Australian context. Safe Work Australia (SWA) is the national policy body responsible for improving work health and safety (WHS) and workers' compensation arrangements. If jurisdictional review and research is needed, the Commonwealth Senate Select Committee on PFAS should contact SWA regarding the coordination of this review. WorkSafe is supportive of this review being undertaken and would welcome the opportunity to partake in this review.

Blood testing was made available to Esso Longford plant workers through WorkSafe. Why is this measure not available to affected workers across the board? How are these decisions made?

PFAS containing firefighting foams, historically used at the Esso Longford site in Gippsland, were phased out in 2017. Esso has undertaken testing of the site's drinking water since 2016.

In 2018, WorkSafe engaged an independent expert to verify test results produced by Esso. The verification showed significantly raised concentrations of PFAS.

WorkSafe met with Esso to discuss the report and also issued an improvement notice requiring Esso to:

- Identify and document all PFAS hazards and identify the potential for human exposure
- Undertake preliminary health risk assessments for workers; and
- Work to eliminate, control or reduce the potential for exposure to PFAS.

As part of the requirement to assess the health risks to workers, WorkSafe suggested Esso offer voluntary blood testing. Esso declined to conduct the blood testing at the time. WorkSafe then entered a funding agreement with the Electrical Trade Union (ETU) to implement limited one-off blood tests for a sample of up to 100 workers at the Esso Longford site.

Under the agreement, the ETU in consultation with the Australian Workers Union and Australian Manufacturing Workers' Union engaged a pathology provider and sourced and selected voluntary participants for the program. Volunteers were selected from each union to be proportionate to their representation at the Esso Longford site.

Given the state of knowledge on PFAS and the advice from the independent health expert panel, WorkSafe did not extend the blood testing program outside the Esso Longford site. It has never been standard practice for WorkSafe to fund such blood testing.

Has anything been done to reduce the PFAS serum levels of the Esso Longford plant workers through WorkSafe or someone else?

WorkSafe is unaware of any actions taken by Esso Longford or any other organisations to reduce the PFAS serum levels of the workers. WorkSafe cannot take enforcement action in relation to PFAS serum levels as there is currently no specific workplace exposure standard for PFAS.

Should you wish to discuss this matter further, please contact Ranya Shahwan, Director, Government and Executive Services, at WorkSafe on (03) 4243 7186 or via email at: ranya_shahwan@worksafe.vic.gov.au

I hope this information supports the Select Committee in its deliberations.

Yours sincerely

Sam Jenkin
Executive Director Health and Safety