

**Select Committee on PFAS (Per and
Polyfluoroalkyl substances)**

**Airservices Australia
Submission – right of reply to
United Firefighters Union of
Australia Aviation Branch
(UFUA) submission**

July 2025

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Overview

On 8 July 2025 the Committee Secretary of the Senate Standing Committee on PFAS (per and polyfluoroalkyl substances) (the Committee) wrote to Airservices Australia (Airservices) advising of a response that had been received from the United Firefighters Union of Australia Aviation Branch (UFUA), in response to questions on notice asked of the UFUA. The Committee offered Airservices a right of reply to the UFUA submission evidence under Senate Privilege Resolution 1(13):

‘Where evidence is given which reflects adversely on a person...the committee shall provide reasonable opportunity for that person to have access to that evidence and to respond to that evidence by written submission and appearance before the committee.’

Airservices has prepared this submission in response to the evidence provided by the UFUA in their submission. Airservices is responding to evidence provided by the UFUA to question 2 and 5 only.

Question 2

Committee question: *Airservices Australia's submission to this committee stated that "despite working on sites known to be contaminated with PFAS, there was no current occupational exposure for aviation rescue firefighting staff". Do you agree with this?*

Occupational Exposure for aviation firefighting staff

UFU claim: *‘Airservices’ claim that “despite working on sites known to be contaminated with PFAS, there was no current occupational exposure for aviation rescue firefighting staff” is a blinkered and inaccurate statement. While exposure pathways have over time certainly been reduced, true to form, Airservices’ remains distracted from the reality of health and safety risks faced by its workers. Airservices’ PFAS-related risk analysis activities are continually focussed on environment, potential litigation and reputation. Airservices has, despite the science, convinced itself that there are no negative health implications caused by the bioaccumulation of PFAS.’*

Airservices response:

The UFUA submission appears to confuse the question of ongoing exposure with the potential health implications of historical exposure to PFAS.

Airservices is not a health advisory agency. Therefore, Airservices has not nor would it ever ‘convince itself’ that there are no negative health implications associated with exposure to PFAS.

Airservices relies on current health advice provided by the appropriate Commonwealth Agencies responsible for health.

Airservices, through the ongoing longitudinal PFAS exposure study, is reassured the exposure to our ARFF staff to legacy PFAS impacts within our operational areas is similar to the exposure of the average Australian. This was confirmed via an independent Queensland Alliance for Environmental Health Sciences (QAEHS) study referenced later in this response.

Avalon Airport contamination

UFU claim: *‘It is telling that Airservices discussion of testing of its employees ends in 2019 and makes no mention of the NHMRC study and further testing among Avalon employees. In fact, Airservices’ submission does not mention the 2022 contamination event at Avalon, a remarkable*

omission. This selective citing of evidence is intended to convey a false impression of no further occupational exposure to PFAS among its employees.'

Airservices response:

The exposure that occurred at Avalon Airport was due to contaminated drinking water that affected tenants at the airport, including the ARFFS station and the air traffic control (ATC) tower. The source of the contamination is unknown. Airservices has never used fire fighting foam containing PFAS at Avalon Airport.

Below is an overview of what occurred at Avalon, how Airservices front-line workers and facilities were impacted, and Airservices response.

Airservices, like at all airports where we provide critical aviation services in Australia, is a tenant at Avalon Airport. Prior to the discovery of PFAS in potable water, water was supplied to our leased facilities by Avalon Airport via a reticulated main system.

As part of an investigation into the occurrence of legacy PFAS at our leased fire station site used prior to the establishment of Airservices, we received a result reporting elevated PFAS concentrations in potable water on 11 October 2022. This was from a single sample taken as a quality assurance 'blank' from a tap at our fire station.

Additional taps were sampled the following day and the laboratory undertook a re-test of the original blank. Results received on 18 October 2022 indicated the presence of elevated concentrations of PFAS throughout all taps tested at the fire station.

Testing of taps at our ATC complex were conducted. The ATC complex is located approximately 500 m 'upgradient' from the fire station. Results of the testing conducted at the ATC complex received 24 October 2022 indicated similar elevated PFAS results in the reticulated water supply there.

Airservices informed Avalon Airport on 21 October 2022 and the Victorian EPA on 27 October 2022 as well as Barwon Water of the discovery of PFAS in reticulated mains water supplied to our facilities.

A summary of actions undertaken following the Avalon PFAS detection are at **Attachment A**.

Airservices primary obligation is the safety of our staff. On 19 October 2022, we informed staff to stop drinking mains supplied tap water at our facilities. Staff were immediately provided bottled water. Airservices subsequently replaced all piping, fixtures and fittings and appliances that had contact with PFAS impacted tap water, undertook a deep clean of external surfaces at the fire station and ATC complex.

Fire trucks and firefighting equipment were cleaned and equipment was replaced. Water that continues to test as being free of PFAS from the main Barwon Water supply continues to be tankered to our facilities, this remains disconnected from the reticulated water supply.

We are providing support to our staff, including blood tests to confirm PFAS levels through the University of Queensland, along with free ongoing counselling. We are supporting our staff who want to donate blood and/or blood plasma as a mechanism to reduce their PFAS levels – including in instances where usual donation pathways via Lifeblood were not open to individuals.

Importantly, there is no indication the source of PFAS in the reticulated water supply was associated with Airservices activities or Airservices lease areas at Avalon. Airservices discovered the presence of PFAS in water supplied to our facilities as part of a separate PFAS investigation.

Although we are not party to the results of testing Avalon Airport may have undertaken across the broader airport estate, Avalon Airport confirmed PFAS is thought to have entered the reticulated potable water system several kilometres upgradient of our leased facilities. This may have resulted in our front-line workers being exposed like many others employed at Avalon Airport and at tenancies on the airport.

In response to the exposure that occurred at Avalon, Airservices commissioned a national program of tap water testing at all Airservices facilities. Elevated PFAS concentrations above the relevant Australian Drinking Water Guidelines were not identified at any other facilities. This national tap water testing program is now ongoing, with testing occurring at our operational facilities annually. Airservices has incorporated the updated Australian Drinking Water Guidelines (25 June 2025) into this testing program, to ensure continued protection of our staff.

Longitudinal Studies

UFU claim: *'The above quoted claim is made specifically in relation to results of the 2018-19 study of ARFFS employees undertaken by the Queensland Alliance for Environmental Health Sciences (QAEHS) unit at the University of Queensland. Blood serum testing undertaken as part of this study found overall, declining PFAS concentrations between the 2013-14 and 2018-19 studies, and this is the basis of Airservices' claim. This is however not the whole story. Far from it. Further large scale blood serum testing of ARFFS employees was undertaken in 2021-22 and 2023-24 as part of a NHMRC study. 2021 results found that PFAS concentrations for Airservices employees based at Avalon airport had not declined, or had increased slightly since 2019.'*

Airservices response:

The role of the Airservices longitudinal PFAS exposure study and the independent – although similar – National Health and Medical Research Council (NHMRC) funded study, and the ability to provide fore-warning of the exposure that occurred at Avalon warrants discussion.

The 'Airservices' study is funded by Airservices although run independently by QAEHS within the University of Queensland. Study participants – including current and former Airservices ARFF and Emergency Vehicle Technician (EVT) front line staff – participate in the study on a voluntary basis. No personal information about individual participants or their specific blood PFAS levels is shared with Airservices. Airservices receives updates about the total number of participants. This study is mandated by strict University of Queensland ethics approvals consistent with Privacy Act considerations.

De-identified and aggregated data are analysed for trends and assessed. Airservices considers work history and potential for exposure to PFAS, including types of firefighting foams used, length of time employed and length of time using PFAS-containing firefighting foams. This allows for an assessment of current potential exposures and the effectiveness of existing controls and enables comparison against other occupationally and non-occupationally exposed cohorts from other studies.

The NHMRC study is an additional independent study. The NHMRC study extends to general public participants from communities known to have been impacted by PFAS contamination. Being funded by the NHMRC, Airservices staff (both current and former) who enrolled in this study did so outside of, and separate to, the Airservices study. Airservices has no knowledge of the number of 'Airservices' participants nor any 'right' to access or control of the data. While blood samples in the NHMRC study were collected and analysed in batches to generate data, at the time the Avalon exposure was identified, the data had not yet been reviewed, assessed or interpreted by

experienced researchers as this was to be done as a single exercise once all samples had been analysed.

The graph included in the UFUA submission was prepared after the discovery of elevated PFAS levels in the tap water at Airservices station at Avalon. It was created following an urgent Airservices request to QAEHS to conduct de-identified analysis of the NHMRC data to determine if there was evidence of any abnormal trends in blood PFAS levels at Avalon and to quantify how long the tap water exposure may have been occurring.

As the NHMRC study was not commissioned by Airservices, it was not possible for us to undertake the WHS assessments to which the UFUA submission refers.

Fire suppression systems

UFU claim: *‘On two separate occasions on 20/5/25 and 22/5/25 ARFFS Melbourne crews responded to alarms on the Melbourne Jet Base aircraft hangar, located on Melbourne Airport. On each occasion, the alarm had activated the hangar’s automatic foam suppression system, creating and dispersing foam throughout the hangar. During a further visit to the jet base on 28/5/25 it was revealed the fire fighting foam employed by Melbourne Jet Base is Fomtec AFFF 3% foam concentrate.’*

Airservices response:

Fire suppression systems maintained by tenants at Federally leased airports is a matter for the airport operator and the regulator of the airport, the Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts. In responding to an incident of an airport tenant, our firefighters are equipped with appropriate personal protective equipment and incident management procedures to minimise occupational exposure which may result from responding to an incident.

Additional comments

UFU claim: *‘Airservices’ submission repeatedly employs qualifiers such as “feasible” and “pragmatic” in describing its actions in relation to PFAS management, suggesting adoption of a safety first approach is subordinated to operational and financial considerations. This sense of priorities is encapsulated in its statement that its objective in managing PFAS contamination is “ensuring financial sustainability while meeting environmental and safety obligations”; UFUA members would agree that this placing of financial wellbeing ahead of human safety is an accurate characterisation of the Airservices’ approach.*

Tellingly, in its ‘Overview’ of the interests it ‘balances’ in implementing its National PFAS Management Program (NPMP), Airservices does not mention workplace health and safety:

“Airservices’ strategic management of PFAS seeks to achieve the appropriate balance of protecting operational service delivery, meeting our environmental obligations, managing stakeholder expectations, and ensuring financially sustainable decision-making (p.6).”

In describing the ‘Engagement approach’ employed in its NPMP, Airservices does not mention consulting with employees and their safety representatives over the impacts of PFAS contamination on their health and safety, which is a requirement under the Commonwealth WHS Act. Incredibly, employees are not listed as one of the stakeholders that are engaged with during site investigations.

Airservices response:

Airservices submission to the inquiry was intended to be 'externally focussed'. The submission provides context for Airservices national remediation program to ensure we maintain operational delivery, meet our environmental obligations and appropriately risk assess the historical use of Aqueous Film Forming Foam (AFFF). The submission provides an overview of the site characterisation to allow an external audience to more fully understand Airservices role and the context in which we operate. Our submission does not diminish the importance of protections or our engagement with staff.

Airservices is committed to the ongoing engagement that we have with our frontline staff in relation to PFAS and we have invested heavily in that engagement.

Throughout 2024, Airservices PFAS and WHS team members undertook on-station, in-person engagement specific to PFAS at eighteen of our stations. At each station engagement was held over multiple days to ensure equitable access to the information amongst rotating crews, with 50 individual crews across all stations. The purpose of this was multi-faceted: to present to our people the findings of the characterisation studies completed relevant to their places of work, to explain the findings in context of the aggregated findings of the longitudinal PFAS exposure study, and to reinforce practical measures including adherence to PPE policies and administrative controls that can and should be taken to minimise the potential for occupational exposure to PFAS. The feedback from this engagement initiative from our front-line staff was overwhelmingly positive.

Question 5

Committee question: *'The Queensland Alliance for Environmental Health Sciences (QAEHS) unit at the University of Queensland has undertaken two studies so far on occupational exposure to PFAS for aviation rescue firefighting staff and intends to continue this now longitudinal study through 2025-2027. What has been your members' experience with the studies so far and do you think they are of value to firefighters?'*

ARFF Members Experience with QAEHS studies

UFU claim: *'The UFUA approaches studies which engage Professor Jochen Mueller with great caution. This is based on his history of denying or minimising the health effects of PFAS chemicals, including making a statement at a public health conference to the effect that "there is nothing wrong with PFAS, and you could pour it on your cornflakes".'*

Airservices response:

It would be inappropriate for Airservices to comment on the views of Professor Mueller held by others, although we note that Professor Mueller is an acknowledged world leader in the field of environmental exposure, is the author of over 400 peer-reviewed scientific publications and numerous book chapters, is a regular presenter to conferences and appeared as a witness in the initial public hearing of the Senate Select Committee on PFAS.

UFU claim: *Our position on the QAEHS studies is wholly focussed on their ability to provide:*

- a) a qualified measure of worker exposure*
- b) an ability to determine over time, if workplace exposure pathways are active*
- c) confirmation over time, of the extent to which exposure controls are effective, or otherwise.*

At present, medical research studies such as these are the only opportunity for our members to be tested and receive results of their blood serum PFAS concentrations. We would prefer a government-mandated and funded regular testing program that guarantees our members who have been exposed to PFAS and continue to work on PFAS contaminated airport grounds will be able to access testing over their careers and into retirement. As it stands, if the QAEHS were to lose funding for this research, or decide to prioritise different areas of health research, aviation firefighters would be left without access to regular blood testing for PFAS.'

Airservices response:

Airservices agrees with the submission made by the UFUA in that there is a role for a government-mandated and funded regular testing program for firefighters. It is important to note that the 'Airservices' study only provides for participants who are current or former Airservices front line workers. Individuals who are not current or former Airservices aviation rescue fire fighters are ineligible to participate.

Notwithstanding this and sharing the view of the UFUA in the critical role of the study, on our own initiative, Airservices has and continues to invest significantly in the monitoring of blood PFAS levels for our front-line staff. This includes a recent re-engagement of QAEHS for a value exceeding \$1.5M for the third iteration of 'Airservices' longitudinal PFAS exposure study.

This third iteration of the study, like the two previous, involves an investigation 'steering committee'. UFUA members are active members of this committee and provide critical input into the function and design of the study. UFUA members on the committee have been complimentary of the study design. We additionally appreciate the role of the UFUA in disseminating awareness of the ongoing study to their members.

ATTACHMENT A

Avalon Remediation Actions

In response to the discovery of PFAS in drinking water at Avalon Airport in 2022, Airservices undertook a program of testing at our facilities at 37 airports nationally. PFAS was not reported in mains-supply water at concentrations above the Australian Drinking Water Guidelines at any other staffed facilities. Airservices continues this monitoring program on an annual basis.

- Mains water was disconnected from the ARFF station and ATC tower and replaced with a connection to clean tank water.
- ARFF Station pipes were flushed to remove residual PFAS and further water samples have been taken post flush to confirm acceptable PFAS levels.
- Deep cleaning was undertaken at both ATC and ARFF and swab samples were taken to confirm acceptable PFAS levels on surfaces.
- Hot water systems and taps were replaced at ARFF and ATC
- Personal equipment including PPE, Breathing masks and uniforms were replaced
- Facilities on site replaced including washing machines, crockery, cooking facilities etc.
- Fire trucks at Avalon were transported to Melbourne for cleaning and testing to ensure PFAS removal
- An occupational hygienist was engaged to consolidate all testing results, assess the site and determine any further mitigations or controls.

People Actions

To protect ARFF and ATC staff at Avalon Airport the following actions were undertaken in response to the detection:

- Continuing support to ARFF and ATC teams impacted by the issue including regular communications, Employee Assistance program and specialist health advice.
- Face-to-face briefings for affected ARFFS, ATC and EVT teams took place following the detection at Melbourne Airport (EVTs) and the Avalon Fire Station and Tower facilities.
- Expert advice from the University of Queensland and Department of Health was provided to our people on impacts of PFAS.
- Our ATC, ARFFS and our EVT teams who work at Avalon were advised that blood tests were available for our people through either the University of Queensland (UQ) or a provider of their choice
- Former staff who have previously worked at Avalon were notified and provided information and support in relation to PFAS results.

Stakeholder Engagement

Following the detection the following agencies/companies and stakeholders were informed and engaged in relation to the response:

- Avalon Airport

- Victorian Environment Protection Agency
- Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts
- Department of Climate Change, Energy, Environment and Water
- Department of Defence (Estate Owner)
- Department of Health, Disability and Ageing
- Barwon Water
- Minister for Infrastructure, Transport, Regional Development and Local Government
- Comcare
- Civil Aviation Safety Authority
- United Fire Fighters Union