

APP203827 Proposal to amend the Fire Fighting Chemicals Group Standard 2017

Submission Reference no: 6

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Submitter Type: Not specified

Source: Web Form

Overall Position: Support in Part

Overall Notes:

Clause

What is the reason for making the submission?

Notes

Whilst working in Queensland over the last 5 years or so, I have been involved in discussions with DEHP for several years to understand and impliment their policy requirements in this area. Although I am now semi-retired my company in Brisbane continues to provide a commercial service to remove, clean and replace fire fighting foam containing PFAS including development and installation of fire suppression system design changes made necessary by the foam concentrate change. I have been involved in attempting to do the same in NZ, however,the EPA's aggressive and selective approach made economic co-operation virtually impossible and has probably resulted in the dumping of significant quantities of PFAS into NZ's environment. I believe strongly that exporting waste is irresponsible and to say that facilities do not exist in NZ for the destruction of PFAS is simply untrue. There are 2 cement kilns in NZ that are the simplest, cleanest and most economic means of converting PFAS back into Ffourite, the mineral that the PFAS was made from.. However, the owners of these two plants have not been interested in fighting the EPA's "export our waste" approach.

Clause

Do you wish to speak at a hearing?

Position

Yes

Notes

Clause

What is your preferred outcome of this consultation?

Notes

Recognition by EPA that 1. It is wrong to export NZ PFAS to other countries 2. Encouragement, subsidy even, for cement kilns to be converted to destroy PFAS

Clause

Do you consider there are any applications for which fluorine-free foams are not suitable or do not have relevant approvals? If yes, please specify.

Position

Yes

Notes

This question inherently suggests that a simple change of foam concentrate from PFAS to non-POP fire fighting foam is a simple substitution. Most AFFF suppression systems will need to be modified in order to be effective with non-POP foam.

Clause

What do you think of the practicality of these disposal provisions, in terms of the resources and costs involved?

Notes

The costs associated with destruction of PFAS under current regulation are prohibitive. There is abundant heresay evidence that existing stocks of foam concentrate containing PFAS has simply been dumped. EPA should also recognise that the vast

majority of PFAS containing foam concentrate contained PFOA (3M Litewater) purchased by the NZ government and "given" to the private sector in contravention of our obligations under the Stockholm convention..

Clause

Would your business be able to contain all foam wastes?

Position

Yes

Notes

My business owns no foam, but would contract to remove, clean and replace foam belonging to others, containing it securely until we can arrange for its destruction.

Clause

Do you have any concerns about fluorine-free foams potentially containing other persistent, toxic and/or bioaccumulative compounds?

Position

Yes - please specify

Notes

Non-POP or fluorine free foams are bio-degradable and need to be contained where practicable until the bio-degradation is complete. I agree with the exceptions for fire brigade use or fire extinguishers, as stated in the proposed ammendment.

Clause

Do you agree with phasing out C6 AFFF at the same timeframe as C8 AFFF?

Position

Yes

Notes

The difference in persistence between C8 and C6 PFAS is insignificant, and essentially based on the Stockholm convention's need to specify individual chemicals. Since manufacturers can invent new C6's faster than the convention can ban them, the only practicable way forward is to ban all PFAS

Clause

Which is your preferred option?

Position

Phase out C6 and C8 firefighting foams at the same time

Notes

as above

Clause

What are your reasons?

Notes

Simplicity Effectiveness

Clause

Can you estimate the cost to your business of phasing out C6 AFFF?

Position

Yes - please specify

Notes

None, but our business is to remove, clean and replace PFAS, and hopefully our business will make a profit