

# SUBMISSION

Friday, 15 November 2024

## AMA submission: Australian Drinking Water Guidelines - Public Consultation on Draft Guidance for Per- and Polyfluoroalkyl Substances

Submitted via survey: <https://consultations.nhmrc.gov.au/environmental-health/australian-drinking-water-guidelines-2024-pfas/>

### Introduction

The Australian Medical Association (AMA) welcomes the opportunity to make a submission to the National Health and Medical Research Council's Australian Drinking Water Guidelines, Public Consultation on Draft Guidance for Per- and Polyfluoroalkyl Substances (PFAS). Having access to safe drinking water is a fundamental human right, and these guidelines are an important step in ensuring that Australian's have limited exposure to hazardous substances in the water they drink.

### 9. Do you have any comments on the overall approach taken to develop the draft guidance?

- ☒ Yes
- ☐ No

*Please provide comments on the overall approach taken to develop the draft guidance*

Overall, the AMA applauds the NHMRC for the diligence it has taken to better understand the impact of per- and poly-fluoroalkyl substances (PFAS) concentration levels found in drinking water on human health.

The AMA supports the NHMRC guidance embracing caution, with the health-based guideline values being conservative, and identifying a range of uncertainty factors to protect against potential risk. We are pleased to see the values prioritise health protection and include reasonable assumptions appropriate to our unique Australian context across multiple jurisdictions, and our difference in localities.

The AMA notes that studies on the impact of PFAS on human health are limited, with many reliant on animal studies, and the research conclusions are often weak quality. Where the NHMRC's guidance related to GenX Chemicals, the AMA requests the NHMRC include a framework/timeline for regular review of Australian and global research and data regarding PFAS. This should include a review early on in the introduction of the new guidelines around PFAS, to analyse if the guidelines are having the desired impact on drinking water quality. It is important to stay vigilant to emerging contaminate risks, as just because these chemicals are not tested for routinely in Australia, and not currently authorised to be introduced in Australia, does not mean they do not exist or present a level of health risk to the community.

The AMA wishes to highlight the United States' Environmental Protection Agency Fact Sheet specific to GenX Chemicals, updated in March 2023 (<https://www.epa.gov/system/files/documents/2023->

[03/GenX-Toxicity-Assessment-factsheet-March-2023-update.pdf](#)) . The factsheet highlights animal studies following oral exposure to GenX Chemicals, which have shown adverse health effects including on the liver, kidneys, the immune system, development of offspring, and an association with cancer. Monitoring of water for GenX chemicals started in the United States in 2017, and we ask the NHMRC to continue to consider the value of testing water in Australia for GenX Chemical levels and to continue to investigate if a health-based guideline value would be appropriate for these chemicals if a risk of contamination is found in Australia.

## 10. Do you have any comments about the implementation or application of the draft guidance?

- ☒ Yes
- ☐ No

*Please provide comments about the implementation or application of the draft guidance*

The AMA agrees with the statement made in the draft PFAS factsheet on page 3, that a preventive approach is the best way to manage risks of PFAS contamination of drinking water supplies and reduce the level of treatment needed. Prevention of contamination must be at the forefront of the implementation plan for the guidance.

The AMA acknowledges the importance of dissemination of information such as PFAS water sources to the public, and recommends that resources such as the Australian PFAS Chemicals Map (<https://pfas.australianmap.net/>) are kept up to date, as these updated standards in the guidelines come into effect. We note that this map is privately funded through Friends of the Earth Australia, and ask NHMRC to explore whether a similar resource could be created through NHMRC's work, with the help of local councils and environment agencies, and water providers.

The AMA advocates that a One Health approach should be applied at all policy levels (including local, regional, federal, and global) in all disciplines to avoid jurisdictions working in silos. This approach is especially poignant to ensuring continued equity of access to water, that is of a safe quality under the guidelines, across all communities around Australia. Important stakeholders to ensure provision of safe water include government departments and agencies, educational and research bodies, Aboriginal and Torres Strait Islander communities, non-government organisations, and industry bodies.

The AMA suggests that a plan to disseminate the guidance updates is devised, which should include planned communication with health practitioners, local councils and health departments that see the risk of water contamination at a localised level. As the NHMRC is aware, the issue of water contamination does not just relate to PFAS but other water contaminants that impact health.

## 11. Do you have any specific comments on the draft PFAS Fact Sheet?

- ☒ Yes
- ☐ No

*Please provide specific comments on the draft PFAS Fact Sheet*

The AMA notes the significant effort put into this version of the draft PFAS Fact Sheet, to ensure health advice is evidence-based and cognisant of the risks of PFAS to public health. We reiterate previous comments about the content of the fact sheet included within the Australian Drinking Water Guidelines, being a living guideline of the most current research findings, especially as new substances and risks emerge. We suggest to the NHMRC that the Fact Sheet will need to be reconsidered and revised regularly in line with new and more substantial findings.

The AMA also suggests that the fact sheet will be of greater use to the public, if it is released with some public health communications that are accessible to all members of the community, to address a growing rhetoric on the risk of 'forever chemicals'. This may involve an update to the Australian Government's PFAS website (<https://www.pfas.gov.au/>) where many of the pages appear to have been last updated in 2019. This information update should include up-to-date contact details for water providers, to ensure the public can contact providers with PFAS related inquiries specific to their locality. The AMA also suggests a broader media campaign, to educate the public through various outlets, including publications, broadcast and online media platforms.

## 12. Do you have any specific comments on the draft NHMRC Statement on PFAS in drinking water?

- ☒ Yes
- ☐ No

*Please provide specific comments on the draft NHMRC Statement on PFAS in drinking water*

The AMA highlights the point made in the NHMRC statement on PFAS in drinking water, that only 2-3% of total PFAS exposure is from drinking water. We suggest that this messaging is appropriately publicised at the time of guideline republication, to bring public awareness to the other avenues for exposure of PFAS, and to combat the fear-based rhetoric around 'forever chemicals'. The AMA believes that undermining confidence in Australia's drinking water is dangerous, and the rhetoric should be a caution over PFAS, and not a fear of Australia's drinking water supplies. The NHMRC also has an opportunity through this work to discuss how many PFAS have already been identified and removed from drinking water supply, showing past and continuing protection and prevention efforts. The AMA also recommends that messaging around the importance of cross-government and departmental work, to reduce PFAS exposure, is clearly mentioned in the NRHMC statement. This could be done in the implementation and monitoring sections. Information dissemination should not be left solely to water providers, when PFAS contamination is linked to broader exposure sites than just the water coming out of taps, regardless of the drinking water guidelines' scope.

### Contact

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