



17 April 2019

Mr Paul Baxter
Commissioner
Fire and Rescue NSW
1 Amarina Avenue
GREENACRE NSW 2190

Dear Mr Baxter,

Since the Department's last letter of 27 September 2018, wherein Deputy Commissioner Jeremy Fewtrell advised that FRNSW would not support a blood-monitoring program, the issue has continued to progress.

On 4 December 2018 the Joint Standing Committee on Foreign Affairs, Defence and Trade's report into PFAS contamination and management in and around Defence Bases tabled its report in the Commonwealth parliament, which stated:

The Committee recommends that the Australian Government review its existing advice in relation to the human health effects of PFAS exposure, including to acknowledge the potential links to certain medical conditions.

and that:

The Committee recommends that the Australian Government, as soon as possible, undertake measures to improve participation in the voluntary blood testing program for PFAS. This should include measures to:

- *increase community awareness about the purpose and importance of the tests, and the associated epidemiological study;*
- *simplify the testing process;*
- *extend the program to be available in additional areas; and*
- *ensure Australia's testing strategy is comparable to international studies.*

Further, the Committee recommends that the Government consider the potential value of blood testing to monitor the effectiveness of measures being used to break PFAS exposure pathways in affected communities. This will necessitate longitudinal analysis of those who have been previously tested and additional tests being made available, after an appropriate period, to persons who have previously been tested.

Two occupational studies into PFAS exposure arising from firefighter foam have also commenced. The first will be undertaken by Macquarie University in conjunction with the Metropolitan Fire Brigade (MFB), with the MFB also introducing PFAS limits for firefighters as well as decontamination programs. During this study, which will be conducted over a 12-month period, 350 firefighters and staff will be tested and the research will inform decision making with regards to minimising PFAS exposure.

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The second study is being funded by WorkSafe Victoria and will involve the testing of up to 100 people who worked at Esso's Longford gas plant and its Bass Strait gas platforms where firefighting foams have been in use since the 1970's.

As these matters progress, the Department and the NSW Government's position is becoming increasingly untenable and arguably negligent. Continued reliance on the advice of NSW Health also misses the point and fails to acknowledge what the Union is actually seeking.

To be clear, the main purpose of a blood-monitoring program at this time is not to manage any current medical problems or predict future health problems for individuals, but rather to:

- a) provide firefighters with a historic baseline of PFAS in their blood (either individually or collectively as a workforce);
- b) allow an assessment of the current controls in place to minimise PFAS exposure (eg PPE and decontamination practices) by taking a baseline assessment now and to monitor into the future as such control measures are improved;
- c) provide data for epidemiological research that is relevant to Australian firefighters.

In light of the studies referred to above, as well as the research currently being undertaken by the University of Queensland with the Department's support, any concerns regarding pre and post test counselling and the confidentiality of test information and resultant data are clearly manageable and not barriers to the program that the Union is calling for.

So, will the Department agree to establish and fund a PFAS blood-monitoring program for the purposes set out above?

Yours sincerely,



Gemma Lawrence
Senior Industrial Officer