



Supplementary submission to Advisor for the
**United Nations Special Rapporteur on Toxics and
Human Rights**

Prepared by
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2. Overview

1. This supplementary submission provides links from two credible blog websites, www.communityovermining.org managed by myself and www.melbournefoe.org.au managed by Anthony Amis. We use a collation of evidence to inform and educate our communities.
2. All government links are the 'so-called' up-to-date information available to the public with their very dated references. That is why we can say with certainty, the information government is presenting to the public is deliberately outdated and dangerously misleading, particularly for PFAS. Worst is the state governments condoning this.
3. Interacting with government, agencies and Commonwealth entities has provided critical information for the few who know how to challenge government highlighting the impact of chemicals in our environment and impacts to human health from unchecked and indiscriminate use of many toxic chemicals.
4. The submission provides the relevant documents and evidence that can help guide some direction why and how our government are failing in policy, guidelines, relevant acts & regulatory frameworks. Moreso, how they enable contaminated food produce and livestock to be traded internationally unknowingly consumed by the families of our trading partners.

3. PFAS

3.1 Regulatory capture

5. Specific industries and lobbyists for agriculture and livestock¹ promoting a clean green image would be substantially impacted if the real extent of PFAS contamination to our prime agricultural lands and water were exposed. These Commonwealth entities and their Boards have conflicts of interest in protecting the Australian Federal Government from liability and potential impacts on trade relations. In doing so, our basic human rights are denied.
6. Certain toxicologists engaged by government to reduce their liability were also engaged by government in 2016 to set PFAS Tolerable Daily Intakes (TDIs) as the safe end point for food safety and human health risk. It was reported at the time as a huge conflict of interest.²
7. Senior departmental bureaucrats (public servants) at state and federal level enable the collusion to continue business as usual and reckless inaction.

¹ <https://communityovermining.org/pfas-livestock.html>

² Consultants paid millions by Defence helped revise chemical safety standards that could shield the department from multiple compensation claims. The Saturday Paper <https://www.thesaturdaypaper.com.au/news/health/2016/08/27/exclusive-toxic-chemical-conflict-defence-sites/14722200003667>

8. State and Federal health departments have gone under the radar for their complicity in lack of health data collation and blood testing in exposed regions, particularly for research purposes, absence of medical training for potential PFAS health impacts and advocacy for workplace exposure protection.
9. PFAS workplace recognition should be a priority. The US have a good webpage full of advice on PFAS - The National Institute for Occupational Safety and Health³ (NIOSH).
 Australian state & national occupational health & safety websites have nothing. A comment in the Guardian by our Prime Minister with the most recent class action settlement with landowners over PFAS contamination.⁴
"It's another example of where we have to get occupational health and safety right. We need to get it right in the first place; that would avoid these sort of actions. The biggest concern that I have with Pfas isn't, of course, a financial one – it is the health outcomes of people who are affected by it."
 Took a long time for the unions to have silicosis recognised as a work safe issue.

3.2 Health impacts

10. Australia has not updated PFAS health impacts from 2017. Australian Federal Senator, Lidia Thorpe, put a question to the relevant Australian department with the answer by government public servants either deliberately, or recklessly misleading.⁵
11. See Victorian Health Department PFAS webpage as an example of poor and outdated information⁶ along with a 2022 international published medical journal,⁷ *Official health communications are failing PFAS-contaminated communities*, noting inconsistencies with Australian PFAS health messaging.

³ <https://www.cdc.gov/niosh/topics/pfas/default.html>

⁴ <https://www.theguardian.com/environment/2023/may/15/australian-government-reaches-1327m-class-action-settlement-with-landowners-over-pfas-contamination>

⁵ <https://communityovermining.org/pfas-health-coverup.html>

⁶ <https://www.health.vic.gov.au/environmental-health/per-and-poly-fluoroalkyl-substances-pfas>

⁷ <https://ehjournal.biomedcentral.com/articles/10.1186/s12940-022-00857-9>

The National Health and Medical Research Council of Australia (NHMRC) acknowledges specific cholesterol, renal, and endocrine findings, yet provides a scientifically puzzling blanket assessment concerning the level of evidence for health impact:

"PFAS has not been shown to cause disease in humans" [95].

...however, it is a strange statement and not aligned with modern reviews...However, the Australian Government Department of Health has communicated a similarly puzzling message about all exposure pathways.

"PFAS has not been proven to cause any specific illnesses in humans" [96].

...It is hard to understand why a national department of health would invoke confounding by diet in the face of these data, and difficult for the reader to be clear what is being conveyed about evidence by the choice of the word "proven." At best, the communication is misleading about the current weight-of-evidence for some outcomes such as abnormal lipid profiles and kidney cancer, and the reader is left uncertain what level and evidence for human and experimental studies is indicated by "proven."

12. The most current Draft National Environment Management Plan (NEMP) V3⁸ is not consistent with other international countries particularly the focus on only 3 long-chain PFAS compounds PFOS, PFOA and PFHxS. With the goal to reduce PFAS exposures under the original guiding principles in NEMP V1, the proposed management strategies via non-regulatory frameworks and failure to update related acts and standards in the NEMP V3 cannot possibly produce the necessary outcomes our communities need to be protected via the food we eat, the water we drink and the air we breathe.

13. Public Servants consulting on the NEMP V3 stated, '*Food Standards Australia New Zealand (FSANZ)*⁹ were involved in the process of developing the Draft NEMP 3, so the NEMP V3 takes guidance and criteria from FSANZ to inform the risk assessments which is the standard we have in Australia.'

Consequently, I submitted a complaint letter to the FSANZ Board challenging the appropriateness of the current TDIs for PFAS and triggers for Human Health Risk Assessments (HHRA). This is based on both changing and proposed PFAS regulations in the European Union (EU) and United States of America (US). FSANZ promptly replied with a 6 page response providing the most updated all-of-government status on PFAS¹⁰ which is negligent for our trading partners, exposed communities and future generations.

AUSTRALIA'S UPDATED POSITION ON PFAS

Associated health impacts were last updated in 2019 with PFAS lifetime exposure levels unchanged since 2017.

I challenged FSANZ on 20 February 2023 giving them an opportunity to reset. Their quick response, 2 March 2023, is the evidence of their updated position - dangerous and irresponsible when we know that state and federal governments are not collating any evidence that would warrant updating.

Read the following complaint letter sent to the FSANZ Board challenging lack of protections for human health highlighting the potential for Board Directors to be liable on what is foreseeable and a lack of due diligence. Their response on 9 March 2023 continues the business as usual while international standards keep lowering.

COMPLAINT LETTER TO FSANZ BOARD

FSANZ RESPONSE LETTER

The FSANZ response noted their own 2021 review of the **Immunomodulation potential of PFAS** peer reviewed by an unknown external expert in epidemiology to back up their inaction.

A new and far more credible review, '**Consideration of pathways for immunotoxicity of per- and polyfluoroalkyl substances (PFAS)**' was available on 22 February 2023 being the most updated health information for immune effects which highlights FSANZ's attempt to undermine health studies as petty.

14. The immunology study quoted in the response was more to do with discrediting other studies which is in conflict to Government & EPA quoting the precautionary principles.

15. Comments & table below note how FSANZ determined the health-based guidance values as noted in Department of Health factsheet.¹¹

⁸ <https://consult.dcceew.gov.au/nemp-pfas>

⁹ <https://www.foodstandards.gov.au/Pages/default.aspx>

¹⁰ <https://communityovermining.org/pfas-food-safety.html>

¹¹ https://www.health.gov.au/sites/default/files/documents/2022/07/health-based-guidance-values-for-pfas-for-use-in-site-investigations-in-australia_0.docx

The tolerable daily intake for PFOS and PFOA are derived from the results of toxicity studies in laboratory animals. FSANZ concluded that the current available epidemiological data on human health is not suitable to support the derivation of tolerable daily intake levels for PFOS and PFOA.

The health based guidance values for use in site investigations in Australia are:

Health based guidance value	Total PFOS+PFHxS	Total PFOS+PFHxS	PFOA	PFOA
	ng	µg	ng	µg
Tolerable daily intake (ng or µg /kg bw/day)	20	0.02	160	0.16
Drinking water quality guideline value (ng or µg /L)	70	0.07	560	0.56
Recreational water quality guideline value (ng or µg /L)	2,000	2.0	10,000	10.0

Note: bw = body weight, ng = nanograms, µg = micrograms

NHMRC used the TDIs developed by FSANZ with the methodology outlined in Section 6.3.3 in the Australian Drinking Water Guidelines to calculate the health based guideline values for PFAS in drinking water.

See Australian drinking water guidelines¹²

16. Outdated testing and methodology can be found in the 2019 Guidance paper on Per and Polyfluoroalkyl substances (PFAS) in Recreational Water by the National Health and Medical Research Council (NHMRC)¹³

3.3 Food safety

17. The integrity of FSANZ is in question and whether political influence is infiltrating our food standards codes as FSANZ health surveys and studies are questionable and application of food safety acts are manipulated as noted in complaint letter sent to FSANZ.¹⁴

18. FSANZ operates under the Food Standards Australia New Zealand Act 1991 which they are not even compliant with.¹⁵

¹² <https://www.nhmrc.gov.au/about-us/publications/australian-drinking-water-guidelines>

¹³ <https://www.nhmrc.gov.au/sites/default/files/documents/attachments/guidance-on-PFAS-in-recreational-water.pdf>

¹⁴ https://communityovermining.org/uploads/1/3/5/9/135967230/fsanz-complaint_letter_to_board-20_02_2023.pdf

¹⁵ **FOOD STANDARDS AUSTRALIA NEW ZEALAND ACT 1991 - SECT 3**

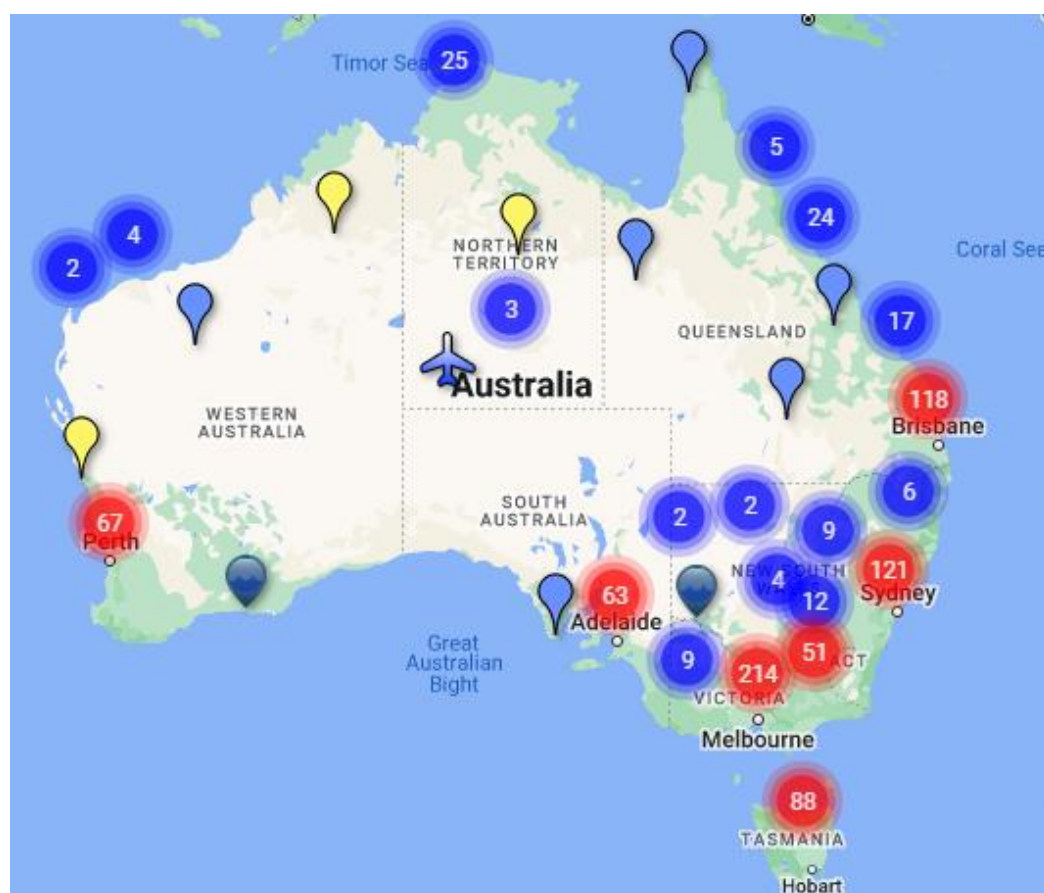
Object of Act

The object of this Act is to ensure a high [standard](#) of public health protection throughout Australia and New Zealand by means of the establishment and operation of a joint body to be known as [Food Standards Australia New Zealand](#) to achieve the following goals:

- a high degree of consumer confidence in the quality and safety of [food produced](#), processed, sold or exported from Australia and New Zealand;
- an effective, transparent and accountable regulatory framework within which the [food](#) industry can work efficiently;
- the provision of adequate information relating to [food](#) to enable consumers to make informed choices;
- the establishment of common rules for both countries and the promotion of consistency between domestic and international [food regulatory measures](#) without reducing the safeguards applying to public health and consumer protection.

19. FSANZ is the one commonwealth entity that every PFAS policy, guideline and regulatory framework defaults to for all state, territory and federal agencies and authorities. Therefore, they are the one body responsible for allowing contaminated food products to be exported or sent to the domestic market to be consumed by children, pregnant women and the health compromised. This includes collusion to enable trade agreements passing on untested, unsafe food products with false declarations to our trading partners.
20. Environment and human health cannot be separated as the one food standard is the default for all human health risk assessment in the absence of all other PFAS exposures government are doing nothing about.
21. VicEPA have stated that short-chained PFAS has increased in the general population blood samples highlighting increasing exposures. While long-chain PFAS has decreased in the same general population, this cannot be said for highly exposed communities.
22. The fact dedicated testing of food samples in these areas which supply significant food produce for human consumption is 'avoided' due to suspect risk assessments is either-
 - with the knowledge of the probability of harm or,
 - with a conscious and reckless indifference to the probability of harm.
23. If PFAS is increasing in the general population and domestic sewerage, then wastewater treatment plants become a risk to the health of our waterways if they cannot reduce PFAS which in turn would reduce many other emerging contaminants.
24. FSANZ decisions, past, present and future are responsible for ignoring:
 - and manipulating their own food safety codes and act.
 - toxicity information on emerging and legacy PFAS, individually and as mixtures.
 - management for the class of PFAS as a whole limiting regulation to just 3 compounds.
 - lack of studies & testing in contaminated zones so food safety results are deliberately missing essential data.
 - micro-dosing as constant exposure of PFAS products everyday accumulating in the body -how we are exposed not just what we eat & drink.
 - workplace exposures breathing in PFAS dust & vapour which do not inform human health risk assessments.
 - PFAS contamination's 30 year start with no attempt to collate essential health data. Implications & cost to society should be influencing and prioritised in national health policy and updated regulatory frameworks as the generational health impacts have already started with cancer clusters.
 - societal cost burden for clean-up, removal of toxic waste and remediation.

3.4 Extent of PFAS contamination



25. Australian PFAS Chemicals Map¹⁶

26. PFAS Chemicals in Victorian Drinking Water Supplies¹⁷

27. PFAS Pollution in Groundwater from Victorian WasteWater Treatment Plants¹⁸

28. Water Industry pollution of Victorian waterways with PFAS chemicals¹⁹

29. PFAS detected in Recycled Water from Victorian WasteWater Treatment Plants²⁰

3.5 Australia's international trading obligations on human health

30. Australia does not test routinely for PFAS in food produce and livestock sourced from PFAS contaminated zones – no data, no evidence, no problem.

31. Australian are breaking international trade laws passing contaminated food stuff as safe for human consumption. Which entity is allowing our own food safety codes to be breached?

¹⁶ <https://pfas.australianmap.net/>

¹⁷ https://www.melbournefoe.org.au/pfas_chemicals_in_victorian_drinking_water_supplies

¹⁸ https://www.melbournefoe.org.au/pfas_pollution_in_groundwater_from_victorian_waste_water_treatment_plants

¹⁹ https://www.melbournefoe.org.au/water_industry_pollution_of_victorian_waterways_with_pfas_chemicals

²⁰ https://www.melbournefoe.org.au/pfas_detected_in_recycled_water_from_victorian_waste_water_treatment_plants

32. Impacted farmers are told not to eat the food they produce but allowed to on sell to market. Stock agents, abattoirs all complicit but say nothing.²¹
33. Safement Australia state farmers do not need to declare PFAS contamination on National Vendor Declarations that their livestock have been exposed to chemicals. Therefore, this industry fact sheet²² becomes a get-out clause for industry and government but not for the farmer. This has not been tested in court but a farmer should not be forced to lie and sign a declaration that his livestock have not been exposed to chemicals from other's contamination just to earn a living.
34. International trading countries importing livestock and food produce may be unknowingly importing food for human consumption where many chemicals are banned in their own countries.
 July 2022 Guardian article - UK trade deal with Australia amounts to 'offshoring' pesticide use, MPs say²³
"Pesticide limits in Australia are 200 times higher than the UK's. They also have 144 licensed pesticides, whereas the UK only licenses 73 of these substances..."
 September 2022 Guardian article – Australian food is grown with dangerous chemicals banned in other countries²⁴
 Has lots of background issues in this article.
35. Recent Senate Estimates provided real livestock data of export & domestic numbers for red meat with the figures noted below from a question on notice.²⁵
- *In the 2020-21 financial year, 191,700 people were directly employed in the red meat and livestock industry. A further 239,000 people were employed by businesses servicing the industry.*
 - *In the 2020-21 financial year, Australia had nearly 76,000 red meat and livestock businesses. – How many have been tested for PFAS contamination?*

²¹ https://communityovermining.org/uploads/1/3/5/9/135967230/primesafe_brendan_tatham.pdf

The CHAIR—Are you aware if there are any standards in respect of perfluorinated chemicals such as PFOS or PFOA?

- *Dr TATHAM—The standards which PrimeSafe utilises and makes codes under the Meat Industry Act, the two which are relevant here are 4696, an Australian standard for the hygienic production of meat for human consumption, and then the food standards code. Under the food standards code there is a list of maximum residue limits for a range of chemicals. They are listed within the food standards code. The technical detail is described in my statement. PFOS is not one of the chemicals listed in the food standards code, which means that in order for compliance to be demonstrated by an abattoir for the food standards code, there should be zero or at the not detectable limit for that chemical, if it is not listed as an MRL in the food standards code.*

The CHAIR—So if it is not listed in the standard, then it should not be present?

- *Dr TATHAM--Correct.*

²² https://www.integritysystems.com.au/globalassets/mla-corporate/meat-safety-and-traceability/red-meat-integrity-system/safemeat_issues-brief_lpa- pfas may-2019.pdf

²³ <https://www.theguardian.com/politics/2022/jun/30/uk-trade-deal-australia-food-imports-pesticide-mps>

²⁴ <https://www.theguardian.com/australia-news/2022/sep/27/australian-food-is-grown-with-dangerous-chemicals-banned-in-other-countries>

²⁵ <https://www.aph.gov.au/api/qon/downloadestimatesquestions/EstimatesQuestion-Committeeld7-EstimatesRoundld20-PortfolioId40-QuestionNumber111>

- In calendar year 2022, Australia exported 68% of beef production as boxed exports, which is slightly below the five-year average of 72%.
- Domestic consumption volumes are typically more stable than exported volumes. As a result, lower production over the past few years has affected export volumes more than domestic consumption. This has meant that a greater percentage of beef production has been consumed domestically.
- In calendar year 2022, beef and veal export revenues (including beef offal) totalled A\$11.22 billion, which is 13% higher than 2021.
- Our per-person domestic consumption estimate for beef is at 23.3kg for 2022, while for beef and sheepmeat combined it is 30kg.
- Over the past several years, beef consumption has averaged around 25kg per person. As this estimate is calculated from several distinct datasets, MLA is generally cautious about providing quarterly or annual estimates, as the variance between datasets can create larger shifts in the estimate than actually exist.
- In the 2021-22 financial year, Australians spent an estimated \$14 billion on red meat, of which \$10.9 billion was spent on beef and \$3.1 billion on lamb.
- As retail prices for red meat have risen and overall domestic consumption remains relatively stable, consumer spend on expenditure on red meat has risen over the past several years.

3.6 Recommendations

36. Australia must align with international standards. Reducing PFAS exposures cannot be achieved collectively unless:
- an independent national EPA is prioritised.
 - review the function of FSANZ to determine PFAS health and risk assessments.
 - the Australian Government accept international science on health impacts and aligns with EU and US PFAS standards.
 - government and agencies prioritise and advocate for eliminating sources of PFAS entering and further mobilising to the environment and domestic sewer system.
 - government prioritise achievable actions like improved labelling, imported point-source tracking of PFAS chemicals and enforceable disclosures on potential for PFAS bioaccumulation if using recycled wastewater or biosolids.
 - enforceable action and resourcing for wastewater treatment plants to better treat wastewater for reuse.
 - official health communications intended to inform the public and health providers about the risks of PFAS exposure to guide community and medical decisions are reviewed and improved.
 - drinking water protection is prioritised in highly exposed and vulnerable communities.
 - improved notifications of potential PFAS contaminated wildlife used as food sources like fish, eels, wildfowl and deer.
 - separate food from the risk.
 - Stop contaminated livestock and food produce from exposed agricultural areas being sold for human consumption. We know it is being sold but where to?
 - Prevent the leasing of PFAS contaminated land in red zones to graze dairy cows, raise livestock and harvesting of crops.

- Prevent the use of recycled wastewater to water livestock.
- Prevent the use of biosolids on agricultural any land.
- Stop allowing the on selling of cheap contaminated properties based on deliberate disinformation to the potential health impacts.

37. Update acts and guidelines to enforce industry compliance to address regulatory capture by industry.

38. Better resource EPA to improve PFAS testing and monitoring to protect communities in highly exposed areas.

39. Review and improve the federal government PFAS portal for *Government Action*²⁶ and *About PFAS*²⁷ due to factually incorrect, misleading and outdated information.

4. Mercury

4.1 Regulatory Capture

40. The Australian Government finally ratified the Minamata Convention²⁸ in 2021.

- o Why did it take so long?
- o Was it due to Minerals Council Australia (MCA) coal lobby influence?

41. MCA submission²⁹ on the proposal for Australia to ratify the Minamata Convention on Mercury in 2014 reveals much in relation to potential impacts to coal mining as Australia has a very poor regulatory framework.³⁰

Mining by-products, including overburden and tailings can sometimes contain naturally occurring levels of mercury compounds representative of the surrounding geology.

*The release of mercury to land and water from a **mining operation is managed under a comprehensive regulatory framework**, including conditions of approval by State and Territory environment agencies. These include managing potential impacts of contaminants (including mercury) on surrounding soils and water. Importantly, the MCA considers the Government response to the Convention should complement these existing State/Territory processes. This will be particularly important, given the impending one-stop shop arrangements.*

42. Industry get-out clause, 'as far as reasonably practicable', is abused by industry as cost prohibitive to avoid installing pollution controls to reduce toxic emissions.

²⁶ <https://www.pfas.gov.au/government-action>

²⁷ <https://www.pfas.gov.au/about-pfas>

²⁸ https://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Treaties/MinamataConvention

²⁹ <http://environment.gov.au/submissions/minimata-convention/minerals-council-of-australia.pdf>

³⁰ <https://www.aph.gov.au/DocumentStore.ashx?id=987efbab-3d84-4e85-a1da-69c8ae07c5f7&subId=510416>

43. Victorian EPA has not managed, measured or monitored mercury emissions in Latrobe Valley onsite, offsite or water sediment. Therefore, no identification or assessment of contaminated sites exists to support the essential remediation.

4.2 Health impacts

44. While poor data exists for mercury emissions, even less exist of potential health impacts. The collation of known health impacts in our coal mining areas should be prioritised to protect the communities and children in close proximity to the mines circled in yellow below for Latrobe Valley, Victoria. The food web is particularly vulnerable to heavy metals deposited or runoff into surface waters used by all our communities for indigenous cultural uses, fishing, stock watering, irrigating food crops and grazing pastures. Likewise for heavy metal leachate into groundwater used for agricultural purposes. There is potential to contaminate the groundwater for ever.



4.3 Recommendations

45. EPA to reassess effectiveness of decision-making for best practice pollution control measures in relation to human rights charter based on full cost analysis to human health and environment as opposed to continuing ongoing toxic emissions.

5. Agricultural Veterinary Chemicals

5.1 Regulatory capture

46. A recent Inquiry on AgVet chemicals was damning as the *'review found serious allegations of chemical industry capture of the APVMA [Australian Pesticides and Veterinary Medicines Authority], which appears to have played a key role in the organisation not performing its full regulatory responsibilities.*
- Agriculture Minister's media release³¹
 - APVMA Strategic Review Report July 2023³²
 - Evidence of lack of chemical review with Australia's fifth national reporting³³ to the Stockholm Convention. Australia has only ratified the original 12 POPs in 2004 but has not ratified any new POPs since.
47. How big pesticide reaches into every element of rural life in Australia³⁴ *'Pesticide companies are deeply connected to rural Australia and provide 90% of the budget for the federal regulator, the Australian Pesticides and Veterinary Medicines Authority.'*
48. Industry discharge licences (including unlicensed discharges) from significant polluting industry is adding to heavy pollutant chemical loading to our waterways threatening human and environmental health.

5.2 Health impacts

49. The contents in the fifth reporting cycle to the Stockholm Convention highlights no ratifying of listed chemicals, no education or knowledge sharing of potential health impacts, no incentives for farmers/plantation manager to change farming practices, no knowledge of stockpiles of prohibited listed POPs and generally poor management of the ag/vet chemical industry. Again, collation of health data in agricultural/ plantation regions which use high doses of ag/vet chemicals is absent as are best practice application to avoid spray drift. Little or no use of passive samplers is used in water catchment areas or near residential properties.
- See Anthony Amis webpage, *Are Queenslanders "Microdosing" on Weedkillers in their drinking water?*³⁵ Information accessed via Pesticide Reporting Portal Water Quality and Investigations.³⁶

³¹ <https://minister.agriculture.gov.au/watt/media-releases/government-action-ensure-integrity-ag-chemical-regulation#:~:text=The%20APVMA%20is%20the%20regulator,regulator's%20operations%2C%20conduct%20and%20governance.>

³² <https://www.agriculture.gov.au/agriculture-land/farm-food-drought/ag-vet-chemicals/apvma-strategic-review>

³³ <https://chm.pops.int/Countries/NationalReports/FourthRoundPartyReports/tabid/9026/Default.aspx>

³⁴ <https://www.theguardian.com/australia-news/2022/oct/07/how-big-pesticide-reaches-into-every-element-of-rural-life-in-australia>

³⁵ https://www.foe.org.au/are-queenslanders-microdosing-on-weedkillers-in-their-drinking-water?fbclid=IwAR1o1cG_VoK5jHd5Ja_zSH7gO-Ocwk9qD62o2gktOc8S2Ef_LeCP5ob3jM

³⁶ <https://storymaps.arcgis.com/stories/c0f0c6d7d88a4fd3a5541fe59f41ff75>

50. Lack of resources for state EPAs contribute to illegal releases of chemicals into waterways.
51. Industry discharge licences from significant polluting industry is adding to heavy pollutant chemical loading to our waterways threatening human and environmental health.

5.3 Recommendations

52. Review industry sector discharge licence conditions to waterways, identifying chemicals in use and how much each licence is allowed to be discharged into waterways to reduce cumulative chemical loading of waterways.
53. EPA be better resourced to address compliance and dumping of chemicals into major waterways.

6. Final comments

54. Australia is the only liberal democracy in the world that does not have a national act or charter of rights that explains what people's basic rights are and how they can be protected.³⁷
55. Basic human rights and a duty of care to the people by government and public servants are not protected or even recognised.
56. Due diligence on unchecked chemical use, contaminated waste and legacy contamination to our environment is poorly managed in Australia with ineffective regularly frameworks and no effective leadership now or proposed for the future.
57. The fate, environmental and health impacts of many chemicals remain unknown. They are not listed chemicals to test for but adding to the growing list of Pollutants of Concern (POC).
58. The Australian Government is playing Russian roulette with our environment and public health as proven by Australia's FSANZ asserting PFAS in food is safe to a certain end point in contrast to other international standards.
59. There is no intergenerational equity. The pollution loading for future generations in the absence of frameworks continue the ongoing lack of political will to hold polluters to account.
60. Lack of monitoring for industry pollution alongside transparency of what chemicals are discharged continue to be condoned by our regulators. This must change.

³⁷ <https://humanrights.gov.au/human-rights-act-for-australia>