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NEW ZEALAND DEFENCE FORCE
COVER SHEET



To accompany documents to the
Minister of Defence

Title:	NEW ZEALAND DEFENCE FORCE – PFAS CONTAMINATION ISSUE		
NZDF File No.	NZDF Tracking # 2017-333 <i>(For OCDF Use Only)</i>	Minister's Tracking#: <i>(For Minister's office)</i>	
Importance of the Issue:	<input checked="" type="checkbox"/> High	<input type="checkbox"/> Moderate	<input type="checkbox"/> Routine
Urgency for Attention/Sign-Off:	NOT URGENT	Request Ministerial response by: Not required.	
Contacts:	[s. 9(2)(g)(i)]	[s. 9(2)(k)]	
Purpose:	To alert you to a complex investigation into a significant land contamination issue at Ohakea, Woodbourne and Whenuapai Air Bases and at the Devonport Naval Base that has implications across the Defence Estate and the steps that are being considered to address it. The investigation will result in media interest.		
Recommendations:	<p>I recommend that you:</p> <ul style="list-style-type: none"> a. Note that priority investigations of PFAS contamination of New Zealand Defence Force sites and adjacent lands and waters are underway. b. Note that an All-of-Government working group to address the wider PFAS issue has been established under Ministry for the Environment leadership; c. Note that the necessary engagement with external stakeholders and resulting media attention will be carefully managed through the All-of-Government working group to ensure all parties have timely access to accurate information and appropriate remedial actions are identified; and d. Note that the Department of the Prime Minister and Cabinet is to brief the Prime Minister but that no firm date for that briefing has been set. 		
MOD/NZDF Consultation	Not required.		
Minister's comments:	<i>Noted:</i>		
Minister's Action:	Signed <input checked="" type="radio"/> / <input type="radio"/> Agreed / <input type="radio"/> Approved / <input type="radio"/> Declined / Discussion required		
	Referred to:		
Signature:	Date: 12 Nov 2017		

T.J. Reating
T.J. REATING
Lieutenant General
Chief of Defence Force
Date 9/11/17

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NZDF/7809/JLSO/2/B40
NTM 2017-333

9 November 2017

Minister of Defence

NEW ZEALAND DEFENCE FORCE – PFAS CONTAMINATION ISSUE

Purpose

1. This briefing alerts you to a complex investigation into a significant land contamination issue at Ohakea, Woodbourne and Whenuapai Air Bases and at the Devonport Naval Base. The investigation has implications across the Defence Estate and this briefing sets out the steps that are being considered to address it. The investigation and implications of potential contamination will require significant community engagement and will likely be a contentious issue.
2. Your predecessor was briefed on this matter on 3 August 2017.

Background

3. The acronym PFAS (used throughout this paper) denotes a group of chemical compounds known as per- and poly-fluoroalkyl substances. They are a class of manufactured chemicals that have been used since the 1950s in the production of a wide range of household and industrial products that resist heat, stains, grease and water.
4. PFAS have been used in fire-fighting foams (known as Aqueous Film Forming Foam or AFFF) due to their effectiveness in extinguishing liquid fuel fires. They have been used by both civilian and military authorities worldwide since the 1970s and are present in older and, to a lesser degree, some current fire-fighting foams as well as many common industrial and domestic materials.
5. Since the early 2000s, PFAS compounds have been increasingly recognised as potentially harmful. PFAS are classified as an emerging contaminant. Human health effects from long term exposure to PFAS are uncertain and internationally a precautionary approach to limit human exposure is being adopted.
6. The New Zealand Defence Force became aware of PFAS as an emerging contaminant through overseas experience and professional networks. The Australian Defence Force has been facing similar issues in recent years and the New Zealand Defence Force has engaged with them to benefit from their experience.

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7. In 2014, it was decided that testing in New Zealand was warranted and the results of routine investigations at Ohakea Air Base were received in early 2015. PFAS concentrations were (and remain) elevated in both surface and ground water at multiple locations within the base. Site-wide investigations are now underway at Ohakea, Woodbourne, Devonport and Whenuapai. These investigations are complex and ongoing.

Current Situation

8. At Ohakea:

- a. PFAS concentrations in surface and ground water, at various locations within the base and leaving the base, are above current acceptable levels and are under continuing investigation; and
- b. The main potable water supply well for Ohakea Air Base contains PFAS compounds. The concentrations of those compounds are below current guidelines. That water is safe to drink.

9. At Woodbourne:

- a. PFAS concentrations in ground water, at various locations within the base, are above current acceptable levels and are under continuing investigation;
- b. It is expected but not yet confirmed that ground water leaving the base will contain PFAS at concentrations above acceptable levels;
- c. The main potable water supply wells for Woodbourne Air Base contain PFAS compounds. The concentrations of those compounds are below current guidelines. That water is safe to drink; and
- d. An alternative supply well that is no longer used contains PFAS compounds at concentrations above current guidelines. In recent years, water from that well has formed a significant part of the potable supply. Investigations to determine how long that well has been contaminated are underway.

10. At Devonport:

- a. Soils, sediments and site runoff at the Sea Safety Training Squadron on the shoreline of Ngataranga Bay are contaminated with PFAS compounds.

11. At Whenuapai

- a. Investigations are underway but no analytical results are available.

12. Communications and Stakeholder Engagement

- a. The New Zealand Defence Force has developed both a Communications Plan and a Stakeholder Engagement Plan, along with draft supporting communication materials.

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Ongoing PFAS Investigations and Management Actions

13. The next major step in the ongoing investigation is to test ground water and surface water on private land adjacent to Ohakea and Woodbourne. Testing will also be conducted in the harbour adjacent to Devonport and Whenuapai. This step will inevitably result in media attention and public awareness of PFAS as an environmental and potential health issue not only for the New Zealand Defence Force but also for other users of fire-fighting foam nationwide.

14. The New Zealand Defence Force, through the Department of the Prime Minister and Cabinet, has begun engagement with other relevant Government agencies to ensure a common All-of-Government position is established before any action is taken that will bring the PFAS issue to public or media attention. As well as the Department of the Prime Minister and Cabinet, those agencies include:

- a. Ministry of Health;
- b. Environmental Protection Agency;
- c. Ministry of Primary Industries;
- d. Ministry of Business Innovation and Employment;
- e. Ministry for the Environment; and
- f. Fire and Emergency NZ.

15. The Ministry for the Environment has taken on the role as Lead Agency for an All-of-Government working group. The New Zealand Defence Force will provide its communications and stakeholder engagement plans to the All-of-Government working group and, based on initial discussions, expects that the working group will take a similar approach. The New Zealand Defence Force will continue its current and planned investigations and will adopt the All-of-Government approach to communications and stakeholder engagement.

Next Steps

16. The PFAS issue is a legacy contamination issue to which there is no straightforward resolution:

- a. The extent to which non-New Zealand Defence Force land and waters are contaminated will be assessed by the ongoing investigations;
- b. The New Zealand Defence Force's response and subsequent steps will primarily be determined by the extent and degree of any off-site contamination and response from landowners and regulatory authorities;
- c. If remedial action is required, the scope of that action might range from substitution of water supplies to bulk earthworks, to minimise ongoing discharge of PFAS; and

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- d. the Department of the Prime Minister and Cabinet is to brief the Prime Minister. No firm date for that briefing has been set.


Media Issues

17. The issue of PFAS contamination is a national and international issue, awareness of which is growing. In Australia it is a contentious issue covered by the media. Testing and decontamination is proving expensive for the Australian Defence Force.

18. For the New Zealand Defence Force, once sampling of private land around Ohakea and Woodbourne starts, then it is likely media will become interested. The New Zealand Defence Force will work with the Ministry for the Environment as lead agency to develop an All-of-Government approach to manage media engagement.

Recommendations

- 19. I recommend that you:
 - a. **Note** that priority investigations of PFAS contamination of New Zealand Defence Force sites and adjacent lands and waters are underway;
 - b. **Note** that an All-of-Government working group to address the wider PFAS issue has been established under Ministry for the Environment leadership;
 - c. **Note** that the necessary engagement with external stakeholders and resulting media attention will be carefully managed through the All-of-Government working group to ensure all parties have timely access to accurate information and appropriate remedial actions are identified; and
 - d. **Note** that the Department of the Prime Minister and Cabinet is to brief the Prime Minister but that no firm date for that briefing has been set.


T.J. KEATING
Lieutenant General
Chief of Defence Force

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