

24 April 2026

Industrial Chemicals Environmental Management Section (IChEM Section)

Department of Climate Change, Energy, the Environment and Water

To Whom it May Concern

**SUBMISSION ON THE PROPOSED INDUSTRIAL CHEMICALS ENVIRONMENTAL MANAGEMENT STANDARD (IChEMS)**

The Australian and New Zealand Biosolids Partnership (ANZBP) welcomes the opportunity to provide feedback to the proposed IChEMS.

The ANZBP is a member-based collaboration of water utilities, consultants, academics and government bodies committed to the sustainable management of biosolids – a residual resource from the wastewater treatment process. It is our mission to support sustainable biosolids management across Australia and New Zealand.

**BACKGROUND : Beneficial use of Biosolids and Contaminants**

The wastewater sector is an essential service, treating sewage from domestic and trade waste (including commercial, industrial and landfill) sources to recover valued resources (including biosolids and recycled water) for beneficial reuse. Australia produces almost 1.5 million wet tonnes of biosolids per year, with an estimated 91% being beneficially used in agriculture, landscaping, forestry or mine rehabilitation (Biosolids Production and End Use Survey, ANZBP, 2023).

In an increasingly resource constrained world, the capacity to return the valuable nutrients (including phosphorus, nitrogen, carbon and a range of micronutrients such as calcium and magnesium) and beneficial microbes in biosolids to soils is a critical pillar of global sustainability and the circular economy. Beneficial reuse of biosolids is facing significant challenges from increasing regulation regarding contaminants.

Biosolids are a passive acceptor of contaminants such as PFAS and other emerging contaminants via wastewater networks – receiving both industrial and domestic sources. The amount of contaminants in our biosolids is proportionate to the amount of contaminants discharged into wastewater systems. The only means of destroying many contaminants from biosolids is thermal treatment – that is incineration or gasification / pyrolysis. Source control, including banning the import, use and manufacture of contaminants, is the only effective way to ensure they are permanently removed from our ecosystems. Greater control over the import, use and manufacture of these chemicals is needed to remove the burden on communities having to pay for high cost ‘end of pipe’ treatment and management.

We note that the cost to buy PFAS is as little as \$150/kg and the cost to treat PFAS in wastewater is estimated to be in the order of \$4M to \$25M/kg of PFAS (Minnesota Pollution Control Agency, [Groundbreaking study shows unaffordable costs of PFAS cleanup from wastewater](#)).

Contaminants in biosolids have a direct effect on the viability of beneficial use of biosolids for land application.

**ANZBP Submission**

The ANZBP supports the implementation of increased regulation as per the proposed IChEMS.

Regarding the management of contaminants we strongly advocate for source control including:

- Bans on industrial use,

- A phasing out of domestic use,
- A requirement for labelling of products that contain PFAS (such as makeup, insecticides, clothing, non-stick pans, and food packaging etc)

Please contact ANZBP Advisory Committee Chair, Rob Tinholt, on [rob.tinholt@water.co.nz](mailto:rob.tinholt@water.co.nz) , with any enquiries regarding this submission.

Yours sincerely,



Rob Tinholt  
Chair, ANZBP Advisory Committee