

PFAS Information sharing, Communication and Engagement Guidelines

NATIONAL FRAMEWORK FOR RESPONDING TO PFAS CONTAMINATION

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Purpose of this document

The PFAS Information Sharing, Communication and Engagement Guidelines (Guidelines) is a part of the National Framework for Responding to PFAS Contamination.

These Guidelines provide advice for all government agencies in Australia involved in responding to per- and poly- fluoroalkyl substances (PFAS) contamination.

This document is divided into three sections. The first section describes principles and practices about information sharing in the context of PFAS contamination. The second section outlines best-practice principles that should be considered when approaching any PFAS communication and engagement activities, along with the rationale behind these principles and guidance about communicating within government and with external stakeholders. The third section provides a set of useful resources such as checklists and prompts to assist agencies to conduct information sharing, communication and engagement activities.

The intended audience for this document is all government agencies in Australia involved in responding to PFAS contamination.

These agencies should familiarise themselves with the overarching principles, and consult the checklists before embarking on communication and engagement activities. This will help ensure all possible steps have been taken to maximise the chances of

achieving clear, fit-for-purpose and effective communication.

The primary aim of this guidance is to support government agencies to communicate and engage with stakeholders and each other about PFAS management pertaining to their responsibilities.

Communicating clearly and consistently, through consultation and information sharing between agencies and across governments, will greatly increase community understanding of the issues. It will also reduce any public confusion, anxiety and distrust in governments. This, in turn, will allow agencies to continue the important work of determining the most appropriate PFAS management and responses, commensurate with risks identified through detailed assessment and analysis of all available information.

The Guidelines were developed in consultation with government agencies involved in PFAS contamination responses, and are based on expert communication advice. Agencies should adhere to the principles within, and review and update the guidance as necessary, for as long as PFAS contamination requires government responses.

Attachment 1 provides some background on PFAS and actions by government agencies in response to contamination.

Scope of this document

The Guidelines set out best practice principles for information sharing, communication and engagement, with the aim of fostering an effective and consistent approach to communicating about PFAS contamination across governments and agencies.

It is important to note, the intention of the Guidelines is not to provide a mandated process, nor to dictate roles and responsibilities. Rather, the Guidelines promote cooperation, transparency, and commitment of resources to individual and shared responsibilities. The Guidelines provide agencies with practical guidance to help ensure that governments and agencies are consulting with one another and collaborating as issues arise, and that communication efforts are appropriate, transparent, consistent, and easily understood by audiences.

These Guidelines provide a comprehensive set of principles and elements to consider when determining the best communication approach in relation to PFAS. They build on current practices, lessons learned by Commonwealth and state and territory

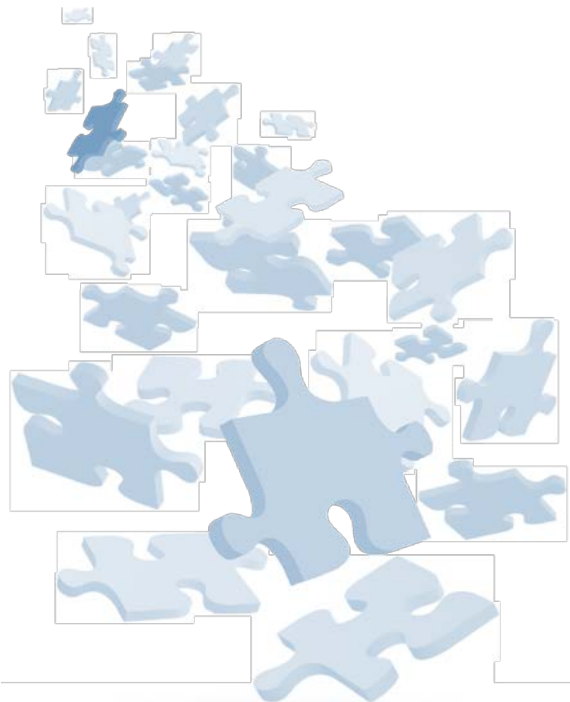
agencies from previous PFAS communication and engagement activities, advice from those with experience from similarly challenging community engagement, and expert advice about managing complex and sensitive issues.

These Guidelines are consistent with existing guidance, including but not limited to:

- Guideline on Community Engagement and Risk Communication – Schedule B8, *National Environment Protection (Assessment of Site Contamination) Measure 1999*
- Responding to Environmental Health Incidents - Community Engagement Handbook, developed by enHealth.

The Guidelines recognise that multiple government agencies are responsible for different aspects of responding to PFAS contamination, and will undertake communication and engagement activities relevant to their responsibilities. The Guidelines also acknowledge that information sharing should be undertaken appropriately and at the right level, taking into consideration any legal requirements and sensitivities.

This document does not discuss approaches for engagement with international government agencies or institutions. In the event of developments in this area, the Guidelines will be updated as and when the need arises.



Information sharing

What is information sharing?

For the purpose of this document, information sharing refers to communication between all entities with responsibilities relating to PFAS contamination at a particular site.

Information sharing is discussed in this context as distinct from *communication and engagement*, which is more focused on providing information to the community.

When an entity becomes aware that PFAS use, historic or current, has resulted in migration of these chemicals off-site, the first response should be to rapidly advise all the relevant bodies with regulatory, commercial, or other responsibilities for the site, the surrounding areas, and the contamination itself¹. The parties can then work quickly and collaboratively to develop a site investigation and risk management plan.

Information sharing should continue throughout the investigation and response process to ensure all parties have all the information they need to act effectively, consistently and in a way that is commensurate with risk.

Information sharing goals

Goals for information sharing in relation to PFAS contamination include:

- All the relevant bodies are aware of the issue and can contribute to the risk management plan;
- Those with regulatory responsibilities have all the data they need to make timely, informed, risk-appropriate decisions;
- Those with responsibility for communications and engagement have all the information they need to provide timely, clear and consistent public

messages that give the community confidence that governments are responding appropriately and being open and transparent; and

- All relevant entities are kept up-to-date as new information emerges.

Why is sharing information important?

Australians expect their governments to deliver services and information consistently and openly. They also expect that, behind the scenes, all levels of government are working together for the benefit of the communities they serve.

Some jurisdictions in Australia have been dealing with PFAS issues for several years. When issues arise, agencies rightly focus on responding quickly and managing risk. However, an unfortunate consequence is that decisions about responding to PFAS contamination are sometimes made in the absence of consultation with all the entities that may be affected by these decisions, including through unintended precedent-setting.

Lack of consultation can lead to inconsistent approach and messages, which creates anger, anxiety and distrust in communities.

Practical and implementable information sharing practices between jurisdictions will help prevent distrust. A collaborative approach means governments can identify issues that may have a cross-jurisdictional impact, and provides the opportunity to work together for a better outcome. It also allows governments to share experiences and expertise to develop innovative solutions. Importantly, sharing information also allows governments to align public messaging to reduce confusion and anxiety in communities.

¹ Note: there may be more than one entity responsible for the contamination, e.g. in the case of airports.

Effective information sharing

Effective information sharing between all levels of government requires a commitment to openness and collaboration.

Timing of communications will vary depending on the circumstances. However, agencies should seek to:

- Inform and consult with other relevant entities as soon as practicable when an event such as a spill occurs;
- Inform and consult with other relevant entities when a new site is identified and before any community engagement is planned;
- Update other jurisdictions on matters such as policy development and directions; and
- Make information sharing a core element of any contamination response effort.

Note: Information sharing should always be undertaken with due consideration given to any legal limitations such as commercial-in-confidence requirements or privacy legislation, and the maintenance of privilege regarding legal advice. In addition, agencies should be aware that materials prepared for information sharing or external communication may be subject to Freedom of Information requests.

Effective information sharing can be achieved through means such as:

- Engaging early with other entities that have a role to play – for example, industry, where it is a potential source of contamination, and local government, where it has responsibility for a site, such as local government owned airports or landfill sites.
- Contacting Environment Protection Authority (or equivalent) pollution hotlines, in sudden events.
- Utilising and connecting existing mechanisms such as Commonwealth and state/territory Inter-Departmental Committees.
- Establishing ad-hoc cross-agency and, where relevant, cross-jurisdictional tactical response groups to develop rapid strategies for responding to unforeseen events as they arise (e.g. spills; unexpected investigation results; significant developments in research).
- Establishing working groups with representation from all relevant agencies, and across jurisdictions if required, to develop discrete products or deliver goals within specific timeframes (e.g. developing remediation research approaches; determining communications strategies in relation to emerging but non-urgent situations).
- Informal information sharing as required.

The PFAS Contamination Response Protocol provides additional guidance about how and when entities should engage and share information as part of good practice processes for responding to PFAS contamination.

Communication goal

The main goals of these communication and engagement guidelines are for the community to feel confident that:

- governments are clearly focused on their wellbeing;
- they have all the available information relevant to them, provided in a timely manner and in a way they can easily understand;
- they are being heard by their government and their concerns are acknowledged and understood;
- in dealing with them, governments are being transparent and honest and acting with integrity;
- they understand what is happening in their local area in relation to PFAS and how it may or may not affect them, as well as what steps they can take to manage this for themselves (e.g. reducing their exposure, keeping themselves abreast of the latest research developments and investigation results);
- their concerns are being addressed by governments who are working together and taking action; and
- they will be kept informed of any significant developments in government policies and activities.

Principles for effective PFAS communication and engagement

These Guidelines have been developed to assist governments to engage with communities on a complex subject where evidence and understanding is still evolving. Good communication aims to provide factual and accurate information in a timely manner, and can minimise the risk of confusion, anxiety and mistrust of the messenger.

In the absence of straightforward, consistent, and understandable messages from governments in Australia or other credible sources, concerned community members will turn to alternative sources such as internet, social and traditional media for information.

Applying the following six key principles of good communication can greatly assist the government in ensuring clear, factual information that effectively reaches and resonates with communities:

1. Proactive is better than reactive
2. Know your purpose
3. Know your audience
4. Communicate clearly, honestly and consistently
5. Never underestimate the value of face-to-face communication
6. Learn from experience

The following pages explain each of these principles in detail. Adhering to them can be the difference between an assured community or one that is resistant to engagement.

PRINCIPLE #1 – PROACTIVE IS BETTER THAN REACTIVE

Wherever possible, be the first and most credible provider of factual information.

In the public discourse about PFAS, we have seen numerous examples where, in the absence of up-front, clear and factual information from credible spokespeople, the media has at times reported incorrect, misleading information, drawing erroneous connections and misquoting scientific literature.

Wherever possible, be the first and most credible provider of factual information

Being proactive in preparing and releasing clear and factual information, as soon as any significant new development occurs, is preferable for a number of reasons:

- it demonstrates government openness and transparency, which engenders trust;
- it avoids the perception that government is trying to conceal issues from the public, or shirk responsibility;
- it provides the media with facts (preferably in the form of quotes from credible spokespeople) and a balanced narrative they can publish; and
- factual information may, in some cases, debunk myths and extinguish interest in the story before it gains momentum and causes unnecessary concern.

KEY CONSIDERATIONS

- Being proactive does not mean saying something for the sake of it. Communities lose patience very quickly when government conducts communication and engagement activities for no clear purpose (see Principle #2 – Know your purpose).
- Being proactive means anticipating situations where the community may receive information from other sources (e.g. the media, or special interest groups) and getting the message across before counter-productive reporting shapes community sentiment, through the use of clear facts and straightforward information that helps the community to understand a situation.
- In situations where the information communities want to receive is not yet available (e.g. investigation results, policy decisions, report findings), the best approach is to provide clear and transparent information from the outset about the process, the likely timeframes, and any obstacles to delivering on time.

PRINCIPLE #2 – KNOW YOUR PURPOSE

Establish a clear reason for communicating – identify the purpose of communication and/or engagement activities before taking any further steps.

Determining the intended outcomes of the activity will help to establish why it is needed and how it should be approached. It will also help to assess whether

communication/engagement is helpful at this time. Reasons for communicating/engaging could include:

- transparency – e.g. advising a community that PFAS-containing fire-fighting foams were used at a nearby site, and testing is about to commence to determine whether PFAS have leached into the surrounding areas;
- new information – e.g. investigation results, research, a new remediation

technology to be used in the area, or a new government policy response;

- incident management – e.g. a spill of PFAS-containing fire-fighting foam, or unusually high levels of PFAS detected in a

community's water supply; and

- information gathering – e.g. local knowledge about site history, local commercial and recreational activities,

local water/food sources and consumption.

Each of these reasons for engaging require different methods of communication to achieve a successful outcome. Think about the best method to suit the purpose and desired outcomes.

A list of different types of communication and engagement activities, and examples of where they may be most effective, is at

Attachment 2.

Establish a clear reason for communicating before taking any further steps

KEY CONSIDERATIONS

- Different governments/agencies will have different reasons for engaging, so there is no one-size-fits-all approach. However, all can benefit by learning from each other's experiences, so consulting others is always a good idea.
- Knowing your purpose will also help to identify which other governments/agencies may need to be involved in the activity. Make sure all the relevant agencies are included – Australia Government, state/territory as well as local government – so they understand the goal and can provide assistance.
- Communication and consultation works in both directions. Consider the input that the community can provide to investigations and decision-making.

PRINCIPLE #3 – KNOW YOUR AUDIENCE

Invest in understanding who the audience is and what their information needs are, before determining the approach.

Understanding the community, their concerns, interests and background, will greatly assist in ensuring the type of engagement meets the community's needs.

Recognise that there will be many different sub-groups within the community, with differing interests and concerns. A better outcome will be achieved if these groups are addressed separately wherever possible. This

*Understand who you are engaging
with before you determine your
approach*

means agencies can answer each group's specific questions and ensure they leave with a good understanding of the facts pertaining to their concerns.

Local knowledge is essential for understanding audiences, so consider meeting

with individuals and groups who represent the community and can outline concerns, key demographics and economic profiles. These individuals/groups might include:

- local GPs;
- community reference groups (or similar);
- local environment centres;
- catchment management organisations;
- Indigenous community health organisations;
- local council;
- Primary Health Networks;
- Community Liaison Officers;
- local chambers of commerce;
- Country Women's Association or similar community associations; and
- Indigenous Elders.

Acknowledging the distinction between primary stakeholders, secondary stakeholders and influencers will greatly assist in tailoring the engagement and messaging to meet the information and emotional needs of the stakeholders.

KEY CONSIDERATIONS

- Most communities have a significant number of existing local networks – both government and non-government. Make use of these networks and the local knowledge they can provide.
- Gathering local knowledge does not have to be resource-intensive. Most of the contact can be made over the phone well in advance of any engagement activity.

PRINCIPLE #4 – COMMUNICATE CLEARLY, HONESTLY AND CONSISTENTLY

PFAS contamination is a complex issue; much of the scientific information can easily be misunderstood.

Communicating to members of the community in plain terms is critical to ensure the information is easy to understand.

If people affected by PFAS contamination cannot understand what governments are saying, they are more likely to view the information with scepticism or as a deliberate attempt to disguise the facts.

Know your audience (Principle #3), tailor communication to suit audience needs, and make sure the information is easy to understand. If possible, test the message with a sample group before communicating with a wider audience to maximise the chances of achieving the desired result.

Be honest about what is, and is not known at this point in time and – most importantly – why.

Additionally, if government agencies, whether Australian Government, state/territory, or local government, provide differing advice (for

example about health and environmental risks, research, investigations, remediation technologies or unforeseen incidents), this can create confusion, anxiety and mistrust. This is why

sharing information and consulting with other relevant agencies at all levels of government, well ahead of any public release, is critical.

Governments and agencies must understand that, while each is responsible for communicating issues within its jurisdiction/portfolio, communication activity will have an impact on all the other entities with PFAS-related responsibilities. This is why consultation and information sharing across governments and agencies is essential.

Be honest about what you do and don't know, what you can and can't say, and why

KEY CONSIDERATIONS

- An effective way to ensure the message is not distorted through retelling is to publish media enquiries and agency responses on portfolio websites, within 24 hours of receiving the enquiry.
- Being consistent with communication does not mean all agencies publish the same set of standard messages with responses for every situation – each agency will need to develop communication specific to the activities within their responsibility. Broader, recurring issues should be addressed consistently, using agreed Talking Points, and any specific and individualised messaging developed should be shared across agencies.
- Always bear in mind that messages may reach a wider audience than intended, so be sure to provide sufficient context that will allow anyone to understand the issues.

PRINCIPLE #5 – NEVER UNDERESTIMATE THE VALUE OF FACE-TO-FACE COMMUNICATION

Face-to-face engagement provides people with a direct assurance that they matter and have been heard.

Face-to-face engagement gives the ‘messenger’ the chance to provide information first hand, correct any misunderstandings early and address concerns for people who are anxious about the news they have received.

People may not like what they are being told, but they generally appreciate the effort of reaching out and engaging in person, and the opportunity to ask questions and request further information.

There will be situations with PFAS communication where the information is difficult to understand and has different implications for sub-sets of the community.

People will always appreciate the effort of reaching out and engaging in person

The most effective way to reduce confusion and anxiety is to offer people opportunities to engage with authoritative spokespeople face-to-face, to address their specific concerns and questions. There are a variety of ways to do this, including ‘walk-in sessions’ or roundtable meetings with special interest groups.

Attachment 2 outlines the relative merits of different communication and engagement approaches.

The next section of this document, ‘**Identifying Stakeholders**’ outlines in more detail the merits of engaging with ‘influencers’ who can significantly shape the public discourse if they have the facts and understand the issues in-depth. Face-to-face engagement with influencers will always be most effective.

KEY CONSIDERATIONS

- Face-to-face engagement can be resource-intensive, but this should be viewed as an investment in understanding people and their concerns, and establishing relationships to pave the way for future communications.
- Knowing the purpose of communication (Principle #2 – Know your purpose) will help determine who the face-to-face engagement should be with. Using judgement with these decisions can reduce the resourcing needs for communication and engagement activities.

PRINCIPLE #6 – LEARN FROM EXPERIENCE

Commonwealth and state/territory agencies, and some local governments, have been conducting communication and engagement activities in relation to PFAS for a number of years, in a variety of formats.

As well as informing the development of this document, these experiences should continue to inform any engagement activity now and in the future.

It is essential that every communication and engagement activity is evaluated to assess its

effectiveness and analyse the public response (including media reactions). However, this evaluation is not useful unless the lessons

learned are shared with relevant agencies and applied to future activities.

De-briefs should be arranged after every

major activity, to ensure experiences and evaluations are shared between all the involved agencies.

Evaluation is essential for continual improvements in how government communicates

KEY CONSIDERATIONS

- Principle #5 Value of Face-to-Face Communication should not only be applied in the context of communicating with the public – government agencies will also benefit greatly from face-to-face communication and information sharing with each other.
- Making the time to talk through experiences together and share opportunities for improvement are invaluable for shaping future activities, while also creating a supportive environment for the individuals involved.

Identifying Stakeholders

Before undertaking any communication and engagement activity, it is important to identify the key stakeholders so a plan for reaching them effectively can be developed. Grouping stakeholders will help to target engagement activities and tailor messages and materials to suit the audience.

It is not necessary to engage with all stakeholders with the same level of intensity all of the time. It is important to be strategic and clear about who you are engaging with, how you are engaging with them, and why.

For the purpose of these Guidelines, stakeholders can generally be grouped into:

- **primary stakeholders** – those who are directly affected.
- **secondary stakeholders** – those with a vested interest and/or the ability to lobby decision makers.
- **influencers**, including:
 - media;
 - decision makers.

A comprehensive list of potential stakeholders and influencers, and reasons for engaging with them, is at **Attachment 3**.

Primary stakeholders

Primary stakeholders are generally those who will be directly affected by a situation; emotionally, physically or financially. They are the priority for communication and their needs should be at the fore when considering engagement activities. These stakeholders will include residents living within investigation sites and surrounding areas, as well as people operating businesses in these areas. In situations where agricultural, aquacultural and fisheries industries operate in the local area, the primary stakeholders may include businesses affected by reputational issues

associated with being near a contaminated site, even if their produce isn't directly affected by PFAS contamination.



Secondary stakeholders

Secondary stakeholders are generally people, organisations or groups with an indirect interest in the situation. They can be very vocal and, even though they may not be directly or personally affected, they can have an impact on policy direction and responses from government.

Secondary stakeholders can include:

- peak bodies and associations;
- organisations leading, coordinating and managing engagement with the community;
- other government agencies; and
- local, state/territory and Australian Government Members and Senators.

It is important that these stakeholders are not overlooked. A sound understanding of their intent and positions and an open dialogue with them will help ensure they have the opportunity to listen and to be heard.

Influencers

Influencers are groups, organisations, experts and professionals who influence community sentiment and can shape commentary about the issue (either negatively or positively). They are the organisations and people others turn to for commentary and advice. They may also be decision makers whose decisions will have a direct impact on the community, thus indirectly influencing community sentiment.

Influencer engagement is a core element of the communication approach as governments continue to respond to PFAS contamination. Early investment in this type of engagement can help shape community sentiment from the beginning. It is an integral part of community engagement and should not be seen as an optional activity to undertake only if time permits.

Successful engagement with influencers requires a commitment to allocate time and resources to provide relevant information and explain what the information means.

Engaging directly with influencers ensures they receive accurate information and have

the opportunity to digest the facts and raise questions and concerns before being approached for comment. This enables them to respond accurately and rationally when fielding questions and representing the community, rather than reacting to community outrage without being adequately informed.

The media

The media is a key influencer with a unique ability to reach a large number of people rapidly and effectively.

Inconsistent and contradictory media reporting leads to a lack of trust and damages the reputation of governments. Government agencies need a collective view of what the issues are and how and when to respond.

Government agencies should respond to media enquiries related to their portfolio responsibilities. To ensure a coordinated approach, agencies should share media enquiries and responses with each other as they arise.

Agencies should maintain an awareness of media coverage and engage positively and proactively with media outlets where possible. Agencies should:

- proactively engage with media in relation to new information, incidents and events whenever possible;
- ensure that any written information provided to media is consistent, succinct, clear and easily understood – if the media cannot decipher the information they will seek input elsewhere;
- use agreed Talking Points wherever possible, to ensure consistency of messaging;
- provide usable quotes from credible spokespeople – avoid jargon;
- monitor local, national, and social media and understand who is saying what, and why;

- be willing to quickly correct the record if appropriate; and
- consider alternatives to media releases – such as opinion pieces and in-depth interviews with spokespeople, if appropriate.

Decision makers

Financial institutions (e.g. banks and other lenders), property valuers, and insurance providers are all examples of decision makers who will make assessments based on the available information that will influence perceptions and can have life-altering impacts

on communities and individuals. Providing these organisations with up-to-date, accurate information and data in relation to site investigations and any other issues that could affect critical economic determinants, such as property values, may prevent disproportionate responses and adverse consequences.

Governments and agencies should work together to coordinate regular approaches to decision makers, providing relevant data and information that will support informed and balanced decisions.

ATTACHMENT 1: BACKGROUND – THE PFAS STORY SO FAR

What is PFAS?

PFAS are a group of manufactured chemicals that have been widely used globally, since the 1950s, in the manufacture of household and industrial products that resist heat, stains, grease and water and in other specialised applications. Because they are heat resistant and film forming in water, some have also been used as very effective ingredients in fire-fighting foams.

Fire-fighting foams containing PFAS have been used in fire training drills and emergencies by both the public and private sectors in Australia and worldwide for more than three decades.

All governments in Australia have been proactively working for a number of years to reduce PFAS use – particularly perfluorooctane sulfonate (PFOS, also known as perfluorooctane sulfonic acid), perfluorooctanoic acid (PFOA) and perfluorohexane sulfonate (PFHxS, also known as perfluorohexane sulfonic acid).

Most people living in Australia will have measurable levels of PFAS in their blood. While we know that PFAS can persist in humans, animals and the environment for a long time, we cannot conclusively say that PFAS exposure is harmful to human health.

Exposure to PFAS can be from a variety of sources such as food packaging, non-stick cookware and, stain protection applications for fabrics and carpets. However, people who work in or live near specific industries or locations may be exposed to higher levels than the general public. The human body gets rid of PFAS over time, so once exposure is reduced, any PFAS in the body will decrease.

Through studies in animals and humans, scientists are learning more about PFAS and the potential consequences of human exposure. There is currently no consistent evidence that PFAS exposure causes adverse human health effects. However, because there is uncertainty and PFAS can accumulate in the body with continued exposure, it is prudent to reduce exposure to PFAS as far as is practicable.

PFAS contamination

PFAS have been used for specialty applications such as in fire-fighting foams and these foams have been used at government and private sector fire-fighting training and incident sites across Australia. Sites impacted by PFAS contamination may also include land irrigated with recycled water, where bio-solids have been applied to agricultural land, and industrial sites.

Communication and engagement about PFAS by governments in Australia

Government communication and engagement activities about PFAS contamination in Australia, have to date, focused on communities around a small number of government sites. Most engagement has been with the communities around RAAF Base Williamtown, NSW, and Army Aviation Centre Oakey, Qld; but other significant engagements have included the communities around Country Fire Authority (CFA) Training College Fiskville, Vic, and Brisbane Airport, Qld:

- The Department of Defence has led engagement with the Williamtown and Oakey communities about PFAS contamination near the Defence bases, with many state and Commonwealth agencies contributing their expertise and resources. Communication and engagement has included updating the communities on the status of investigations, issuing precautionary health advice, and informing the communities about available services. Local government has also been involved in community engagement, with the Port Stephens Council being a member of the local Williamtown Community Reference Group.

- Over a number of years, rural fire-fighters have raised concerns about the use of PFAS-containing fire-fighting foams in training at the former Victorian CFA Training College Fiskville. The Victorian government has engaged extensively about PFAS contamination at the site and the Victorian Legislative Assembly conducted an inquiry. The Victorian government has tabled a response to this inquiry and has provided funds to decommission and remediate the site, as well as to establish a new firefighting training centre in the Central Highlands and upgrade the training facility at Huntly.
- In 2017, PFAS-containing fire-fighting foam was accidentally discharged in an airline hangar at Brisbane Airport. The spill was mostly contained on airport land but some of the foam entered a nearby creek and a sewerage treatment plant. The Queensland government issued health advice about eating seafood from the nearby area.

The reactions of these communities have shaped the public perception about PFAS contamination.

Ongoing uncertainty

While there is ongoing uncertainty about health and environmental impacts and in some cases, the extent of contamination, it is challenging to communicate what is and is not known without raising anxiety and allowing the spread of misinformation.

Technical information

Much of the information about PFAS is technical and complex. Health and environmental research generally uses highly technical language and assumes the reader has subject matter expertise. There is a risk that if technical reports and research are released without adequate plain English explanations and context, their meaning may be misunderstood.

Precautionary advice

The Environmental Health Standing Committee (enHealth)² has advised that there is no consistent evidence that exposure to PFAS harms human health. This means that some human health studies have found associations between exposure to these chemicals and health effects and others have not.

Because these chemicals persist in humans, animals and the environment, it is sensible to implement precautionary measures to minimise human exposure while researchers continue to investigate the potential effects of these substances on human health.

On this precautionary basis, governments in Australia have provided some communities with information about how to limit their exposure, such as to avoid drinking, or eating food grown with, contaminated water.

Precautionary advice and actions, while appearing to be prudent and sensible from a risk perspective, have contributed to the communities' confusion, anxiety, and in some cases, anger, about the contamination. It can be difficult to understand why governments would say PFAS is not proven to be a risk to human health while they are also advising you not to drink water from your property.

Government agencies involved in responding to PFAS contamination have a responsibility to ensure the public receives information and advice about precautionary measures that is not alarmist and is commensurate with the risks.

² enHealth is a subcommittee of the Australian Health Protection Principal Committee (AHPPC). The enHealth membership includes representatives from Commonwealth, State and Territory health departments; the New Zealand Ministry of Health; and the National Health and Medical Research Council.

ATTACHMENT 2: COMMUNICATION AND ENGAGEMENT ACTIVITIES

| Engagement type | Benefits of approach | Risks of approach |
|---|---|--|
| <p>Community town hall meeting / presentation</p> | <ul style="list-style-type: none"> • Provides the opportunity to deliver information to a large audience simultaneously. • Ensures everyone gets the same information and messages. • Allows the community to ask questions. • Ensures broad and common issues can be clarified on the spot. <p><i>Most useful when the information to be delivered is not contentious or highly emotive in nature.</i></p> | <ul style="list-style-type: none"> • Physical distance between presenters and attendees makes it difficult for presenters to show they are listening and demonstrate empathy. • Creates the opportunity for a ‘media spectacle’ and/or promotion of other agendas. • Can set up confrontation between speakers ‘panel’ and audience. • Limits the number of and type of questions that can be answered. • Audience members may not be comfortable asking questions in front of the whole group. |
| <p>Community walk-in session (held in a venue where representatives from all relevant Commonwealth and state/territory agencies, and local government representatives (where required) can be seated at subject-specific tables that community members can approach for one-to-one discussion)</p> | <ul style="list-style-type: none"> • Provides a forum for targeted, personalised communication with community members. • Creates direct contact with the community and helps to build relationships that assist with future face-to-face engagement. • Provides an opportunity for communities to ask personalised questions in a non-confrontational environment. • Controls the situation more effectively. • Allows for one-on-one attention from experts. <p><i>Most useful when the information to be delivered is technical or raises questions and concerns from the community that are best addressed in detail, and in a more personalised context.</i></p> | <ul style="list-style-type: none"> • Can be resource intensive. • Not all community members will engage with this format. • Ongoing legacy issues can fuel negative community sentiment |

| Engagement type | Benefits of approach | Risks of approach |
|--|--|--|
| <p>Community round table (facilitated and requiring registration to attend)</p> | <ul style="list-style-type: none"> Provides the opportunity to inform, educate, provide the facts and answer questions in a smaller and more controlled group setting. Allows all people to have their views heard and questions answered. Reduces the risk that the meeting will be hijacked by the vocal minority – maximises the opportunity for reasonable and respectful discussion. <p><i>Most useful when engagement has become heated and the message is being drowned out by enraged members of the community.</i></p> | <ul style="list-style-type: none"> Can be resource intensive. Not all community members will engage with this format. |
| <p>Community representative group</p> | <ul style="list-style-type: none"> Provides the opportunity for ongoing engagement with community and interest group representatives. The small group format allows for concerns to be thoroughly addressed and misinformation to be corrected. Allows for in-depth explanations and open dialogue. Helps to build trust. Provides an opportunity to test messages, information materials and engagement styles. <p><i>Most useful as a forum for discussion and feedback between government and local communities.</i></p> | <ul style="list-style-type: none"> Selection of appropriate community representatives can be difficult and create additional concerns, particularly if the wider community does not feel their views are represented well by those who put themselves forward for these roles. Success relies on a chairperson or facilitator and representatives' commitment to work together collegiately. |
| <p>Influencer briefing</p> | <ul style="list-style-type: none"> Provides the opportunity to inform, educate, provide the facts, and answer questions directly with the aim of influencing commentary and community sentiment. These influencers can then become 'credible, trusted' communication conduits to the broader community. <p><i>Should be done first, so influencers are ready to respond when other engagement occurs.</i></p> | <ul style="list-style-type: none"> Can be resource intensive. Influencers could use briefings as an opportunity to promote other agendas (however, they are likely to do this with or without a briefing – this way they are informed). |
| <p>Targeted stakeholder meeting</p> | <ul style="list-style-type: none"> Provides the opportunity to inform, educate, provide the facts specific to their issues and concerns, and answer questions. Allows for in-depth explanations. A targeted approach helps build positive relationships. <p><i>Should be part of any engagement approach.</i></p> | <ul style="list-style-type: none"> Can be resource intensive. Stakeholders could use briefings as an opportunity to promote other agendas (however, they are likely to do this with or without a briefing – this way they are informed). |

ATTACHMENT 3: IDENTIFYING STAKEHOLDERS

| Stakeholder | Reason for engagement |
|------------------------------|--|
| Affected communities | <ul style="list-style-type: none"> • These communities' reactions to government responses to PFAS have shaped the national conversation to date, and are likely to continue to do so in the near future. • Community members need to receive timely, open, transparent and consistent information about what PFAS contamination means for them. Some people may have to change their behaviour to reduce risk of exposure. • These communities are concerned about health effects and loss of property value, and some people are experiencing anxiety and anger. |
| National media | <ul style="list-style-type: none"> • The national media is valued by the community as a regular source of information and opinion. • National media will shape the public conversation about PFAS. • Providing factual information will help ensure media coverage is more balanced. |
| Local media | <ul style="list-style-type: none"> • Local media is valued by communities as a regular source of information and opinion, and often as a 'defender' of communities' interests. • Providing factual information will help ensure media coverage is more balanced. |
| Local government | <ul style="list-style-type: none"> • Where local government is not otherwise involved (for example, as a lead entity), they may be engaged as a stakeholder. • Residents and local media may look to what local government is saying. They may also seek more information from them. • Providing information to local government will help dispel misunderstandings, increase opportunities for a balanced narrative and mitigate the risk of the issue escalating in the media. |
| Health related groups | <ul style="list-style-type: none"> • Local GPs are trusted by community members about health issues. • Health groups need information to have informed discussions with their patients. • Media seek comment from medical professionals about health risks. • Health groups can be a valuable conduit to communicate health messages. |
| Financial bodies | <ul style="list-style-type: none"> • Providing financial bodies with a better understanding of the risks of PFAS contamination and the response strategies underway will help them make informed and rational decisions, based on facts. |

| Stakeholder | Reason for engagement |
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| Key local agricultural groups | <ul style="list-style-type: none"> • Organisations in and around investigation areas need to know what the implications are for them. Some of their members may have to change their operating practices. • Engaging with these organisations could help correct misconceptions about the effect of PFAS contamination on agricultural and aquacultural industries. |
| Federal and state/territory Members and Senators | <ul style="list-style-type: none"> • Members and Senators’ constituents may be concerned about what PFAS contamination means for them. • Members and Senators represent the concerns of their constituents and could seek to do this via the media. • Providing information and briefings to Members and Senators will help dispel misunderstandings, increase opportunities for a balanced narrative and mitigate the risk of the issue escalating in the media. |
| Airport operators and tenants | <ul style="list-style-type: none"> • Organisations in and around airports where aqueous film-forming foam (AFFF) has been used need to know what the implications are for them. Some of their members may have to change their operating practices including their use of products containing PFAS and/or they may need to take some responsibility for contamination management. • Engaging these bodies may limit confusion and inconsistency. |
| Peak associations and unions | <ul style="list-style-type: none"> • Associations and unions seek to represent the concerns of their members and may do so via the media. • Associations and unions may lobby governments on behalf of their members – seeking policy responses that do not negatively impact their members or sector. • Providing information and briefings will help reduce misunderstandings and can reduce the risk of disagreements playing out in the media. |
| Remediation industry and researchers | <ul style="list-style-type: none"> • Engaging with these organisations will promote open communication about remediation work and options. • The remediation industry and researchers can be an authoritative voice about remediation options and research into health effects. • Media is likely to seek comment on research and remediation options. |
| Licensed water providers in states and territories | <ul style="list-style-type: none"> • Water providers are responsible for water services within a state/territory, including potable and non-potable water supply, sewerage, irrigation and drainage. • Engaging with these organisations will assist them in making decisions about water supply and provide them with guidance on drinking and recreational water levels. • They can also provide assurance to the community regarding the safety of the water supply. |

ATTACHMENT 4: CASE STUDY

Government agencies encounter a wide range of issues relating to PFAS. Issues are not always problems, rather an issue could be any situation that the governments must respond to in a coordinated and strategic way. Issues could include (but are not limited to):

- new information about a site investigation;
- accidental discharge of a product containing PFAS into the environment;
- factually incorrect or inflammatory media coverage;
- new health advice;
- new advice to international trading partners about PFAS levels in Australian agricultural products;
- a new international environmental standard; or
- a new state/territory environmental management policy announcement.

The case study below shows how the communication and engagement principles can be applied in practice and how information should be shared across jurisdictions. There is no 'one-size-fits-all' model – communication and engagement needs to be tailored for every issue.

Case study: Accidental discharge of PFAS into the environment



This is a hypothetical scenario to outline how the communication and engagement principles could be applied in practice:

- A fire suppression system in a fuel facility at a federally leased airport is activated by mistake. A number of containment systems fail and a significant volume of product containing PFOS and PFOA is released into the environment.
- The fuel facility operator stops the release of the product and repairs the fire suppression system.
- The fuel facility operator notifies the airport operator of the incident and the airport operator then notifies the Commonwealth Department of Infrastructure and Regional Development (Infrastructure) and relevant state/territory authorities.
- It is possible (but not yet confirmed) that the product spilled into a nearby waterway used for irrigation of market gardens.
- Residents surrounding the airport use reticulated water.
- An airline had a similar spill at another airport a month earlier. The government was criticised at the time for not responding.

In this scenario although the fuel facility operator is responsible for the spill, governments should engage in proactive communication and engagement. This can help shape the public conversation, avoid confusion, counter misinformation, and assist state/territory agencies to perform their roles.




Case study continued: Accidental discharge of PFAS into the environment

Which agencies have an interest in this issue?

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| <p>Commonwealth</p>  | <ul style="list-style-type: none"> • Infrastructure – public perception of responsibility for airports. • Airservices – public perception of responsibility for airport contamination. • Environment – contamination could affect or be perceived to affect the environment. • Health – contamination could cause public concern about perceived risks to human health. • Agriculture – contamination could affect or be perceived to affect local agriculture and subsequently international trade. <p><i>Which agency is the lead for this issue? If a lead is not clear, which agency is this issue most relevant to?</i></p> <ul style="list-style-type: none"> • Department of Infrastructure and Regional Development. <p><i>How can Commonwealth agencies work together?</i></p> <p>For all agencies:</p> <ul style="list-style-type: none"> • Share information about the issue as it becomes available. • Share and seek input on media enquiries and correspondence about this issue. • Provide advance notice of any public communication or engagement and seek input from other agencies where possible. <p><i>Which Ministers have an interest in the issue?</i></p> <p>Minister for Infrastructure and Transport – public perception of responsibility for airports and airport contamination.</p> |
| <p>States / territories</p>  | <p><i>Which state/territory agencies have an interest in this issue?</i></p> <ul style="list-style-type: none"> • Environment, Agriculture, Health: <ul style="list-style-type: none"> ○ Contamination could affect or be perceived to affect the environment or local agriculture, or cause public concern about perceived risks to human health; and/or ○ Conduct additional testing on the environment or food supply relevant to the investigation area; and/or ○ May impose regulatory measures for the respective portfolios. <p><i>Who is the most appropriate Commonwealth agency to share information?</i></p> <ul style="list-style-type: none"> • Infrastructure – regulates and maintains relationship with the airport operator. |



Case study continued: Accidental discharge of PFAS into the environment

What information should be shared?

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| <p>Governments</p>   | <ul style="list-style-type: none"> • Commonwealth Department of Infrastructure and Regional Development ensures all relevant Commonwealth and state/territory agencies are aware of the situation. • Clarify the extent of lead responsibilities. • Commonwealth Department of Infrastructure and Regional Development shares contact information for the airport operator as required. • Commonwealth Department of Infrastructure and Regional Development explains to other agencies what communication and engagement activities they plan to undertake – e.g. news releases, newsletters, community consultations. • Commonwealth Department of Infrastructure and Regional Development seeks information about proposed statements or actions planned by the state/territory. |
| <p>Public</p>  | <p><i>Who are the primary stakeholders for this issue?</i></p> <ul style="list-style-type: none"> • Residents close to the airport. • Market gardeners using water from the potentially contaminated waterway. <p><i>How can the Commonwealth and states/territories work together to communicate with the primary stakeholders?</i></p> <p>Residents:</p> <ul style="list-style-type: none"> • Attend the next meeting of the Community Aviation Consultation Group (CACG) (an established community representation group), if it exists, for the airport – Commonwealth Department of Infrastructure and Regional Development together with state/territory health and environment representatives. <p>Market gardeners:</p> <ul style="list-style-type: none"> • Attend a meeting arranged by the state/territory agriculture agency with the local market gardeners – Commonwealth Department of Agriculture. <p><i>What information is relevant to the primary stakeholders?</i></p> <p>Residents:</p> <ul style="list-style-type: none"> • Australian Government and state/territory responsibilities. • The Australian Government’s regulatory oversight of airports. • Current health and environmental guidance about PFAS. <p>Market gardeners:</p> <ul style="list-style-type: none"> • Commonwealth and state/territory responsibilities. <p><i>Who are the influencers for this issue?</i></p> <ul style="list-style-type: none"> • Media. • Politicians. • Local government. • Agricultural peak bodies. |

Case study continued: Accidental discharge of PFAS into the environment

How can the Commonwealth and states/territories work together to communicate with the influencers?

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| <p>Public</p>  | <ul style="list-style-type: none"> • Commonwealth releases a media statement by the Minister for Infrastructure and Transport, with early notification to the state/territory. • Provide timely responses to media enquiries prior to media reports being published so that the public has accurate information – any agency that receives enquiries on this issue. • Involved agencies brief relevant state, federal and local politicians. • Commonwealth Department of Agriculture attends a meeting arranged by the state/territory agriculture agency with agricultural peak bodies. |
| <p>Evaluation</p>  | <p><i>What information is relevant to the influencers?</i></p> <p>All:</p> <ul style="list-style-type: none"> • Action the Commonwealth is taking. • Australian Government cooperation with state/territory agencies. <p><i>Was the objective of the communication/engagement achieved?</i></p> <ul style="list-style-type: none"> • Department of Infrastructure and Regional Development monitors media coverage and seeks feedback from the CACG (if it exists for the airport). • Department of Infrastructure and Regional Development emails other Commonwealth departments and state/territory agencies requesting feedback about lessons learned and suggestions for similar future communication and engagement. |