

**Guidance
Note**



Fire Industry Association

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**FIA Guidance: PFAS in Firefighting foams
Restrictions Update September 2024**



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1. Current situation

Currently there is no legal restriction on the supply or refilling of current fluorotelomer based AFFF in fire extinguishing applications including fire extinguishers.

By way of background since at least [2010], all AFFF has been based on fluorotelomer chemistry which does not contain PFOS/PFOA or PFHxS. Prior to that date AFFF was likely to contain PFOS/PFOA or PFHxS.

PFOS/PFOA/PFHxS are chemicals covered by UK and EU REACH & POPS (Persistent Organic Pollutants) Restrictions which ban their use at certain concentrations. The concentrations of these chemicals in AFFF used in fire extinguishing applications is above that threshold. PFOS and PFHxS are already banned, PFOA will be banned from July 2025.

Refilling extinguishers or fixed systems which have contained PFOS/PFOA/PFHxS with fluorotelomer foam will not make them exempt from the PFOS/PFOA/PFHxS bans. This is because they will still contain trace amounts of the chemicals above the prescribed limits.

2. Going forward

2.1 Europe

The EU are proposing a 2 REACH restrictions that would ban PFAS in firefighting foams (PFAS is the generic term for all fluorinated compounds including fluorotelomer foams) in the EU.

The first of these which covers applications of PFHxA, (EU) 2024/2462 was published on 19 September 2024.

It covers 3 applications of PFHxA

- Textiles and from 10 October 2027 it is banned in amounts over 25ppb but does not apply to PPE covered by the PPE Regulation
- Firefighting foam for training and testing and Public FRS (except COMA sites i.e. industrial chemical sites) from 10 April 2026 it is banned in amounts over 25ppb
- Firefighting foams for Civil aviation from 10 October 2029 is banned in amounts over 25ppb

It doesn't cover portables and fixed systems as they are covered by the firefighting foam restriction which has yet to be published

And doesn't impact UK other than for export purposes and influencing the DEFRA/HSE consultation process for the UK restriction.

The second covering firefighting foam, specifically has yet to be published.

2.2 UK

In the UK DEFRA/HSE have started a consultation for a UK REACH restriction on PFAS in firefighting foams. They are currently consulting industry and a public consultation will be held next year.

It is unlikely that any UK restriction (on PFAS?) will be in place prior to 2026. Any transition periods would likely be similar to those in the proposed EU restriction i.e. 5-6 years for portables, 10 years for marine uses. It is unlikely that we'll see any total ban prior to 2030 at the earliest.

3. Impact of Restrictions

Note any total PFAS ban would impact on all waterbased extinguisher that contain PFAS e.g. AFFF, wet chemical and some water additives.

As with previous such bans, we would expect there to be considerable supply-side issues as manufacturers clear stock, move to new fluorine free product, etc. There will also be increased demand for disposal of extinguishers containing restricted agents. This would likely have significant impact on the market and end users and their suppliers should be mindful of this.

4. FIA Position

We (FIA) are recommending people start to plan for a move to fluorine free agent, but there is no legal requirement yet. When dates are confirmed, FIA will issue more precise guidance

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