



Behind the ban

PFAS in firefighting foams



Banning PFAS one by one left room for near-identical substitutes, which led the EU to restrict the whole class in firefighting foams. Here's what drove that shift and what it means for you.

Quick summary

The EU has restricted PFAS as a chemical class, not as individual compounds, in firefighting foams under REACH. The ban phases in over a ten-year transition, with the most complex, safety-critical uses given the longest to switch, closing a substitution loophole that compound-by-compound bans had failed to shut.

Who this affects

Fire services, airports and aviation operators, offshore oil and gas operators, military and maritime operators, users of firefighting equipment, and manufacturers, suppliers or distributors of firefighting foam in the EU.

About the author

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Information correct as of October 2026.

For decades, firefighting foam soaked into the ground at airports, military bases and industrial sites across Europe every time crews trained for a fire that never happened. That foam contained PFAS, sometimes called "forever chemicals" because they do not break down in the environment.

Near EuroAirport Basel-Mulhouse, on the France-Switzerland-Germany border, past use of firefighting foam at the airport contaminated the surrounding groundwater. In 2025 PFAS levels in drinking water around Saint-Louis, the French town next door, regularly exceeded the regulatory limit, and vulnerable residents in 11 communities were told not to drink tap water. It is one of dozens of similar cases across Europe, each linked back to the same foam.

Up to 4x

the EU's legal PFAS limit, measured in drinking water around Saint-Louis in 2023 and 2024, linked to past foam use at the nearby airport.

Source: Le Journal des Entreprises, April 2026, citing ARS Grand Est data

In October 2025, the EU moved to stop that pattern repeating, banning PFAS in firefighting foams under REACH.

What happened

The European Commission adopted the restriction, Regulation (EU) 2025/1988, on 2 October 2025. This means PFAS as a class now sits under a single new REACH restriction covering firefighting foams, rather than the patchwork of individual compound bans that came before it.

The restriction defines PFAS broadly as any substance containing at least one fully fluorinated methyl (CF₃) or methylene (CF₂) carbon atom. From 23 October 2030, firefighting foams with a total PFAS concentration of 1 mg/L or more cannot be placed on the market or used in the EU.

As with most restrictions of this scale, regulators are phasing in the ban rather than making it immediate, giving industry time to switch to fluorine-free alternatives without compromising fire safety.

Under the Regulation, 23 October 2026 is the last day on which foams containing PFAS at or above 1 mg/L can be placed on the market for use in portable fire extinguishers. Companies already holding PFAS-containing portable extinguishers can continue using that equipment until 31 December 2030. Separately, from 23 October 2026, the continued use of PFAS-containing firefighting foams more broadly is subject to interim conditions: use is limited to fires involving flammable liquids (class B fires), emissions must be minimized, a site-specific

management plan must be kept on file for 15 years, and labeling requirements apply. For alcohol-resistant foams for portable extinguishers, the last day for placing on the market is 23 April 2027. The most complex, safety-critical uses have the longest transition: Seveso III sites, offshore oil and gas installations, military vessels, and civilian ships that already had foam on board before October 2025 must fully comply by 23 October 2035.

Behind the ban

This restriction started life as a proposal in January 2022, when ECHA first prepared it at the Commission's request, and took almost four years to reach adoption.

What makes this restriction notable is what it does not do: it does not name individual PFAS compounds. Some PFAS used in firefighting foams, including PFOS, PFOA, PFHxA and the C9-C14 PFCAs, had already been restricted under earlier REACH and POPs Regulation entries. But naming compounds one by one had already shown its limits: banning one PFAS often just shifted the market toward a close, unregulated substitute, similar enough in chemistry to do the same job, different enough on paper to fall outside the rule, whether or not that was the intent behind the switch.

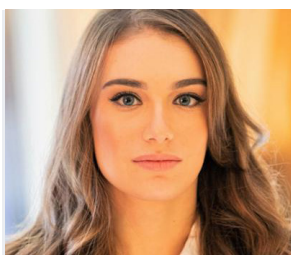
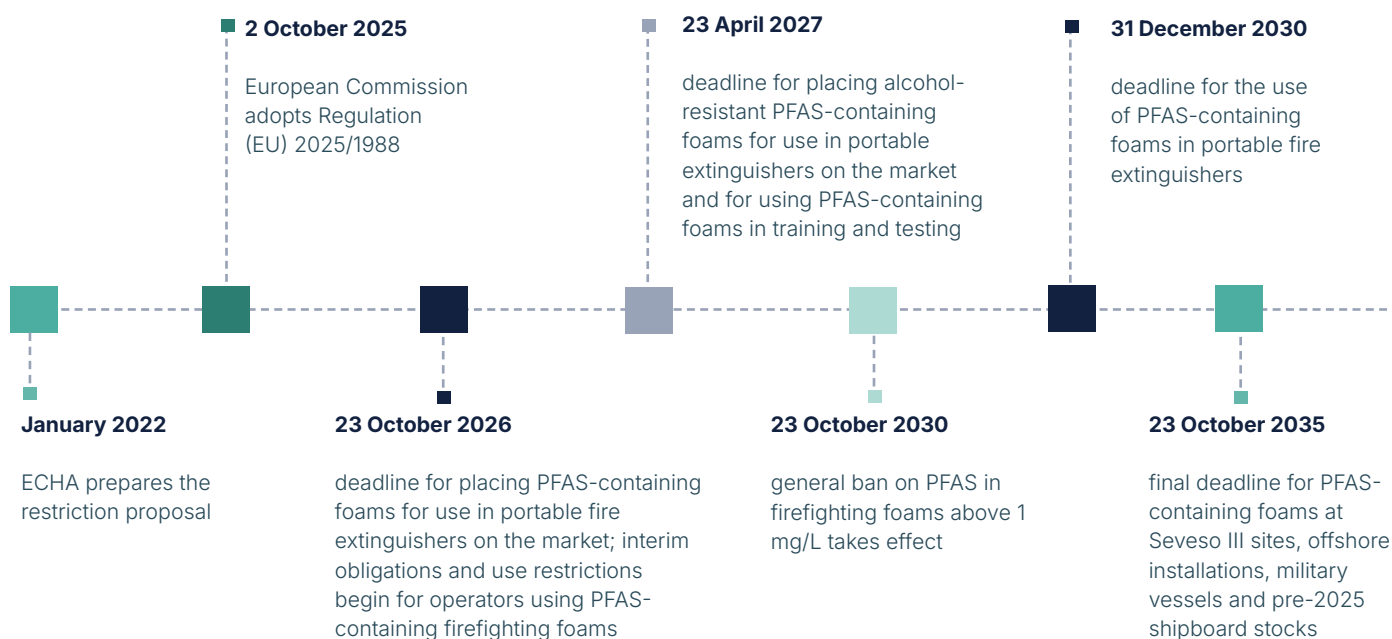
Regulators call this pattern regrettable substitution, and it is exactly what this restriction is built to stop. By restricting the entire PFAS class rather than a list of named substances, it closes the substitution loophole at its source. Substances the earlier entries already restrict still count toward the new 1 mg/L cumulative limit, helping prevent new PFAS compounds from taking the place of previous ones.



The loophole, in short: ban one PFAS by name, and a near-identical, unregulated substitute can take its place. Ban the whole class, and there is nowhere left to hide.



Timeline



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Expert take

This restriction only makes sense once you see it as a response to regrettable substitution. Regulators had already learned, the hard way, that banning individual PFAS compounds just pushed the market toward close, unregulated substitutes. Writing the ban around the whole PFAS class rather than a list of names is what actually closes that loophole. It is a shift in regulatory thinking that is already shaping how PFAS, and possibly other persistent chemical groups, are restricted going forward.

What it means for you

Companies that manufacture, supply or hold PFAS-containing firefighting foams need to work backward from 2030, not forward from today. The transition runs in three broad phases, and where an organization sits depends on what it uses foam for and the sector in which it operates:

Earliest phase – a user of PFAS-containing firefighting foam falls under the first deadline: use restrictions and operational requirements take effect from October 2026. A supplier of PFAS-containing foams for use in portable fire extinguishers, meanwhile, can no longer place them on the EU market after 23 October 2026, with alcohol-resistant portable foams following in April 2027.

General phase – most other users, including industrial and commercial sites, fall under the general ban from October 2030, when any firefighting foam containing

PFAS at or above the 1 mg/L threshold can no longer be placed on the market or used, unless covered by a remaining derogation.

Extended phase – an offshore oil and gas operator, military site or Seveso III establishment sits in the longest transition, running until October 2035, though the interim obligations, such as minimizing emissions and documenting a management plan, apply well before then.

Regardless of phase, every foam purchase, storage decision and disposal record can be scrutinized well before the relevant deadline arrives, and the class-based approach behind this restriction is worth watching beyond firefighting foams, a pattern already shaping how the EU is approaching PFAS in drinking water and other persistent chemical groups.

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