



## **Wildlife and Countryside Link's response to the HSE consultation on its proposal to restrict PFAS in firefighting foam**

We support the Health & Safety Executive's (HSE) proposed restriction on the use of per- and polyfluoroalkyl substances (PFAS) in firefighting foams (FFF), urging action without delay.

PFAS-containing firefighting foams have caused significant environmental contamination - particularly around military and aviation sites, and oil and gas refineries. With safer alternatives already in use globally, this source of pollution is avoidable and must be urgently stopped. The proposed timelines, however, should be much faster, and the approach outlined in the proposal must be extended to a universal restriction on its uses and manufacture.

### **The adoption of the OECD definition of PFAS**

We welcome HSE's adoption of the internationally recognised OECD definition of PFAS, and the recognition of PFAS as substances of high concern based on their persistent, mobile and toxic (PMT) characteristics. This acknowledges and prioritises for urgent regulatory action those characteristics in PFAS which present particular risks to the environment and health: for example, that they barely degrade in the environment and are very mobile in water, and are associated with irreversible, long-term contamination of the environment.

The OECD definition is a science-based approach which recognises that PFAS share a common fluorinated carbon structure, and ensures consistency across scientific studies and regulatory analyses, as well as across jurisdictions. Regulating PFAS as a class (of over 10,000 substances) is the only practical and feasible strategy. As the consultation document outlines, the adoption of the OECD definition minimises the risk of the substitution and use of as yet unidentified PFAS, which would carry the same risk to environmental and human health. It will also future proof the industry against additional piecemeal restrictions on PFAS and reduces the burden on the regulator from having to risk assess structurally similar chemicals on an individual basis.

- **The health and environmental risks of PFAS**

PFAS is a known persistent, highly mobile and toxic chemical. Its use in firefighting foams has significant and lasting effects on environmental and human health, in particular to firefighters who have regular and significant exposure to these chemicals. [Studies show](#) that firefighters using PFAS-based FFFs have unacceptably elevated levels of PFAS in their blood, indicating serious occupational exposure risks. PFAS has [been linked with](#) serious health



problems including hormone disruption, cancer, fertility issues and immune system dysfunction.

It has also contaminated soils, groundwater and drinking water sources, especially around training facilities, airports, military bases and oil and gas facilities where the use of firefighting foams is prevalent. An Environment Agency commissioned [report](#) estimated there are up to 10,000 'high risk sites' in the UK, which also includes sites such as landfills and sewage treatment works. As a persistent and highly mobile group of chemicals, it accumulates in the environment, wildlife and humans and with the availability of alternatives, should be phased out as a matter of urgency.

- **Costs of PFAS**

Whilst there are market costs to transitioning to non-PFAS alternatives in firefighting foams, the current market does not account for its true burden. These costs, currently borne by wider society [far exceed](#) the transitional costs to non-PFAS alternatives, through degradation in environmental and human health and the associated clean-up costs which are significant. For example, the Environment Agency has previously [warned](#) it does not even have the resources to carry out investigations of four problem sites to which the use of fighting foams has contributed, before even considering clean-up costs which could be up to £1.8m-£2.7m.

- **Alternative options-PFAS-free firefighting foams**

As set out by HSE in the restriction dossier, there are already PFAS-free alternatives available, which are in use across sectors and globally, including in the UK. These alternatives have been [found to](#) meet or exceed international fire performance standards and are already in use in airports, military bases and oil and gas installations.

Several countries and industries are already taking steps to prohibit the use of PFAS in firefighting foams. These include [Australia](#) and [the EU](#) who have adopted wide-ranging restrictions on the use of PFAS in firefighting foams; [Canada](#) who has designated PFAS as a toxic substance, a step towards potential regulatory controls and phase out; and the [Department of Defence](#) in the United States who have begun to phase out the use of PFAS containing firefighting foams in its facilities.

Transitioning to non-PFAS alternatives in firefighting foams is a long overdue measure which would bring the UK in alignment with appropriate safeguards for human and environmental health.



- **Timescales for transition**

We encourage the transition to non PFAS firefighting foams without delay and would query the length of the transition time for military, oil and gas sectors. The proposed 10-year transition period seems difficult to justify as the petrochemical sector has been found to cover 60% of firefighting uses in the EU (which is likely to be similar in the UK), with [several companies](#) having already transitioned to fluorine-free alternatives. As such a major source of continuous emissions of PFAS into the environment, its transition to non PFAS alternatives is urgent and important.

While the EU's restriction has similar transition times, those times have already started as the regulation [entered into force](#) last year, which also risks unsold stock getting dumped on the GB market.

- **Broadening PFAS restrictions in the UK**

Whilst the adoption of the OECD PFAS definition in firefighting foams and the acknowledgement of their toxic and persistent nature within the documents is welcome, this should form the starting point, not the end point for UK-wide restrictions on all PFAS uses.

Whilst significant, firefighting foams are only one contributor to the burden PFAS places on the UK's environmental and human health. These chemicals are embedded across a wide range of consumer products, industrial processes, and applications, for which viable alternatives already exist or are in development.

Globally, there is a move towards wide-reaching PFAS restrictions, including in the EU. The UK should act with similar ambition to uphold global standards and its credibility on chemical safety.

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 94 organisations to campaign for nature, climate, animal welfare and a healthy environment for everyone.

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This response is supported by the following organisations:

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