

The consequences of the EU restriction of PFOA in fire-fighting foam in 2020

What does the listing of PFOA in Part A of Annex I to EU-Regulation 2019/1021 on persistent organic pollutants mean for firefighters?

Does the fire-fighting foam contain more than 25ppb PFOA*?

Only a laboratory analysis of the foam can determine this with certainty. This analysis should be the base for any decision. It is more likely that older (older than five years) fluorine based foams (AFFP/FP/FFFP) exceed the threshold and less likely for new fluorine-based foams. Foam manufacturers have already been prepared to meet this threshold by Commission Regulation (EU) 2017/1000 as of 4th July 2020.** They have developed foams with high purity levels that are still fluorine based but meet the limit values.

*EU-Regulation 2019/1021 restricts PFOA or any of its salts above 25ppb (0,025 mg/kg) and any individual PFOA-related compound or a combination of PFOA-related compounds above 1ppm (1 mg/kg).

**As PFOA will be listed in the POPs Regulation (EU) 2019/1021 in July 2020, the restrictions in (EU) 2017/1000 will be removed from REACH Annex XVII.

No

You do not have a problem at the moment
(But be aware: More restrictions of other PFAS are on the way)

Yes

For what do you use the fire-fighting foam?

Class A fires

The use of fire-fighting foam that does not meet the limit values for Class A fires is not allowed as of 4th July 2020

Liquid fuel fires (Class B fires)
and liquid fuel vapour suppression

The following deadlines apply:

Manufacturing and sales

of fire-fighting foam exceeding the threshold is not allowed. Manufacturers have developed foams that meet the limit values, including both fluorine free as well as fluorine based foams.

Stockpiles

Stockpiles at premises of end users to refill systems can be used until 4th July 2025, taking into account the additional restrictions for their use. Stockpiles need to be notified to the Competent Authority.

Fire-fighting foam in appliances and extinguishing systems

can be used until 31st December 2022. From 1st January 2023 to 4th July 2025 it shall only be used when all releases can be contained. No use after 4th July 2025.

Training

Fire-fighting foam that does not meet the limit value shall not be used for training of personnel as of 4th July 2020.

Testing

Fire-fighting foam that does not meet the limit value can only be used for testing until 4th July 2025 if all releases are contained.

What options do you have?

Replace with fluorine free foam

If your risk assessment allows, consider replacing your foam with fluorine free fire-fighting foam.

Pros:

A sustainable solution that also avoids further restrictions of PFAS.

Cons:

A drop-in replacement is not possible. Replacement needs some planning and time.

Replace with high purity C6 foam

Manufacturers have developed high purity C6 foam that is still fluorine based but meets the the limit values.

Pros:

Foams meeting the threshold can be compatible with old foams.

Cons:

Not sustainable. Further restrictions are on the way, making further replacement in future likely. Clean-up after use can lead to high costs.



Werkfeuerwehrverband Deutschland
German Industrial Fire Protection Association

Working group on fire-fighting foam
Eike Peltzer, eike.peltzer@gmx.de

More information:

Peltzer (2019): Fluorhaltige Schaummittel – ein Paradigmenwechsel.
In: WFVD-Info II/2019