

AFFF Regulations: Global Year in Review

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In 2025, countries around the world implemented or proposed regulations to restrict the use of per- and polyfluoroalkyl substances (PFAS), also known as “forever chemicals.” Specifically, countries are implementing more stringent regulations regarding the use of aqueous film forming foam (AFFF), which contains PFAS. AFFF is attractive to companies and governments around the world because of its unmatched effectiveness in rapidly extinguishing high-hazard flammable liquid fires by forming a film that smothers fuel vapors, cools the fire, and prevents reignition, a critical safety need where lives and property are at risk. However, AFFF and PFAS are alleged to be linked to a number of adverse health effects, including cancer, kidney disease, liver problems, immune disorders, and birth defects. As a result, in 2025, governments across the globe sought to phase out the use of AFFF.

In April and October 2025, the European Union adopted amendments to the Registration, Evaluation, Authorization, and Restriction of Chemicals (REACH) regulation to restrict the manufacturing, use, and placing on the market of all PFAS substances in AFFF. The regulation banned C8 perfluorooctanoic acid-containing AFFF on July 4, 2025. Beginning on October 23, 2030, AFFF being used or placed on the market must contain less than 1 mg/L for the sum of all PFAS. Notably, the regulation phases out the use of AFFF with a concentration of more than 1 mg/L for the sum of all PFAS in certain contexts, such as the functional testing of firefighting systems, in portable fire extinguishers, and in military vessels. The first phase begins April 10, 2026, and the last phase begins in 2035.

Similarly, the Canadian government proposed and published a consultation document containing a multiphase risk management approach for PFAS-containing AFFF in March and September 2025. The approach is part of the Canadian Environmental Protection Act and will have three phases. Phase 1 proposes a prohibition on the manufacture, import, use, and sale of PFAS not already regulated in firefighting foams, such as C6 AFFF. There will be transitional periods as well as time-limited exemptions for exceptional circumstances to accommodate critical applications that cannot be phased out.

The United Kingdom's Environmental Agency and Health and Safety Executive published a proposed UK REACH restriction in August 2025. The proposal includes transitional periods regarding the use of PFAS in firefighting foam. After the consultation period ends in February 2026, the Health and Safety Executive will deliver its opinions and the United Kingdom's Department for Environment, Food, and Rural Affairs will determine whether to restrict AFFF.

The increase in restrictions on the use and production of PFAS-containing AFFF requires companies with facilities across the globe to be aware of the products used not only in production, but also in safety measures. Companies must carefully navigate these regulatory activities to avoid liability for PFAS exposure at their facilities.