



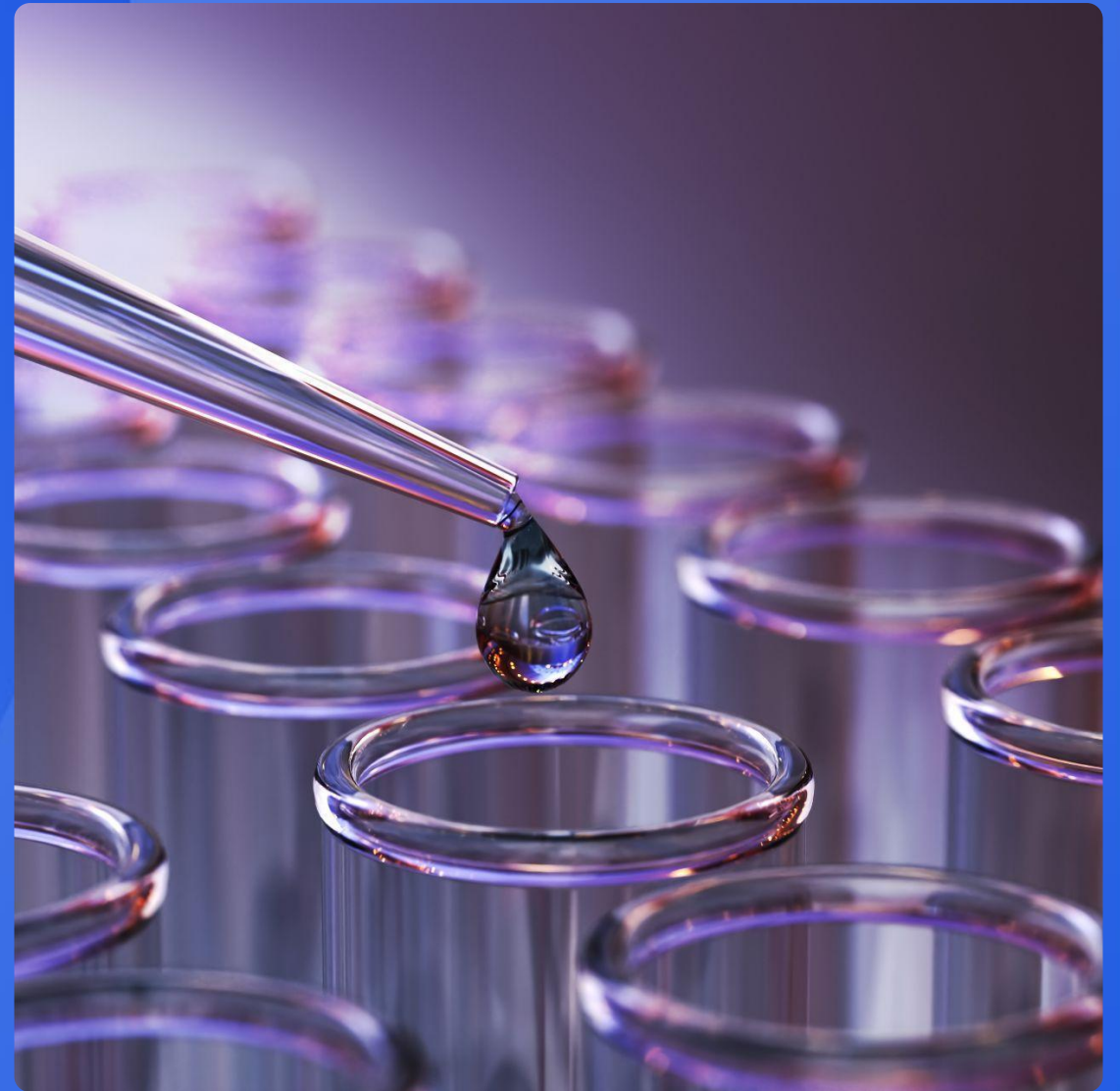
Compliance & Risks



Webinar

# PFAS Regulations: Are You Ready for What Comes Next?

25 February, 2026



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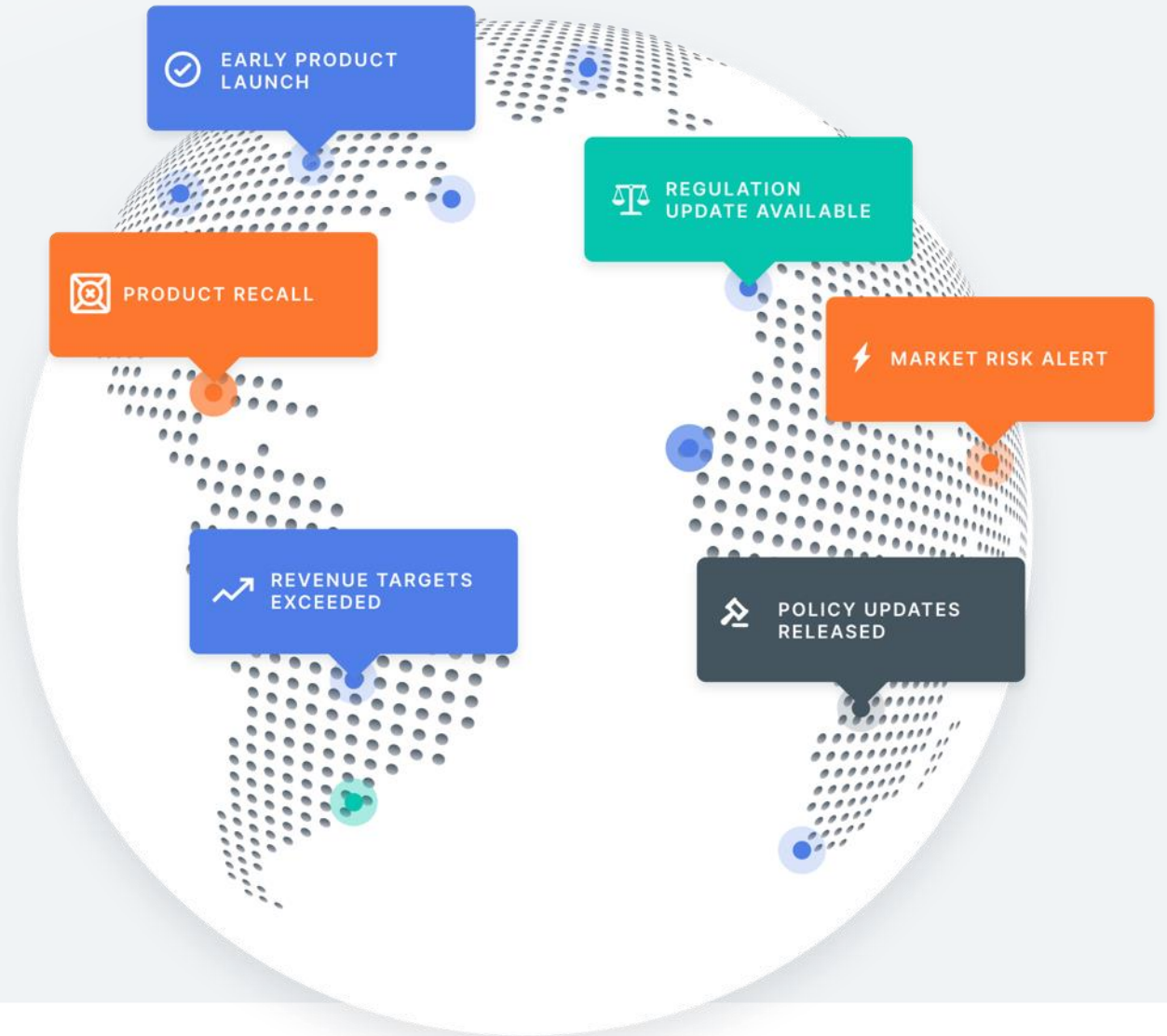
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# Per- and Polyfluoroalkyl Substances (PFAS) Agenda

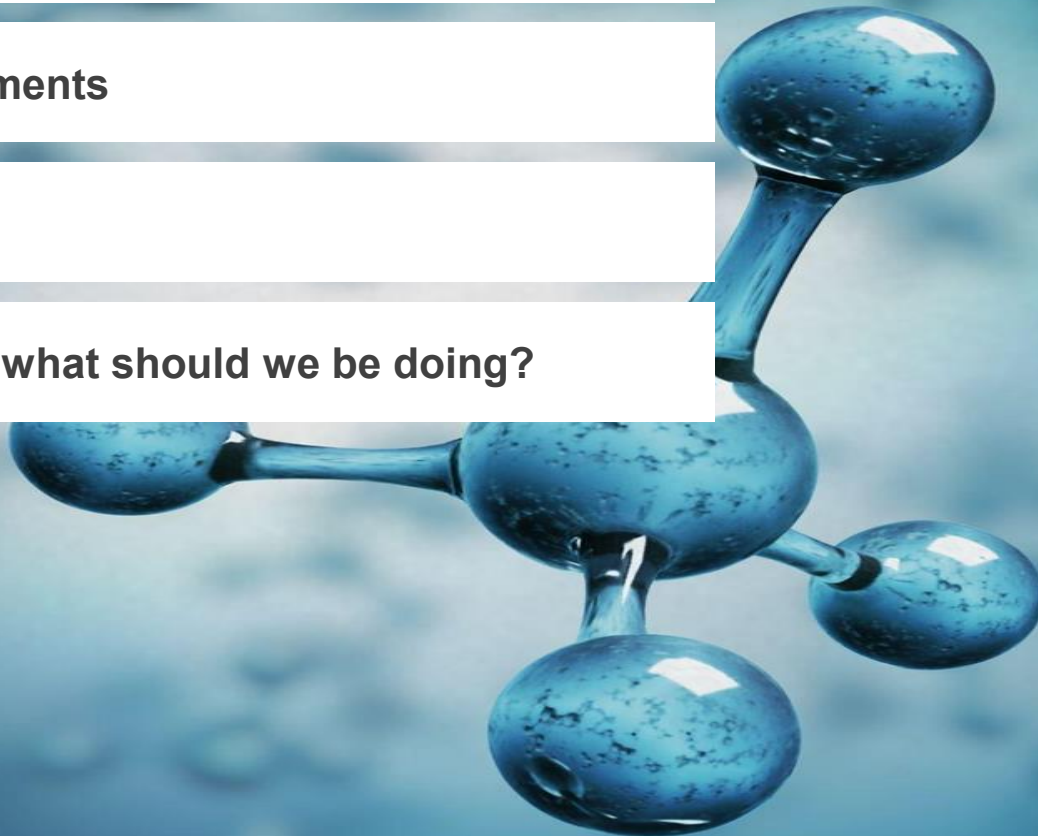


The main PFAS laws in Europe, United States and Canada

Restrictions and reporting requirements

Developments in PFAS legislation

Looking into the future for PFAS – what should we be doing?



# PFAS: What is it and Where it is Used



Fire fighting foam  
Chemical / Biological resistant PPE  
Bacteria / virus resistant fabrics  
Dirt resistant fabrics  
Waterproof fabrics  
Stain resistant fabric treatments



Circuit board films  
Conformal coatings  
All semiconductor chips  
Cleaning fluids for microelectronics  
Semiconductor manufacturing aids



Flexible plastic  
Cable and wire insulation  
Conduit and conduit connectors



Batteries  
Shock absorbers  
Bushes & Bearing surfaces



Hydraulic fluids  
Gaskets  
Seals  
Hoses  
Valves  
Tubes  
Sealant  
Flexible joints  
Pipe & tank linings



# PFAS Definitions

## OECD Definition:

(OECD= Organisation for Economic Co-operation and Development)

Any substance that contains at least one fully fluorinated methyl ( $\text{CF}_3$ -) or methylene ( $-\text{CF}_2$ -) carbon atom (without any H/Cl/Br/I attached to it).

## UK Definition:

Any substance that contains at least one fully fluorinated methyl ( $\text{CF}_3$ -) (without any H/Cl/Br/I attached to it), or two or more contiguous perfluorinated methylene ( $-\text{CF}_2$ -) groups

## EU Definition:

OECD definition and a substance that only contains the following structural elements is excluded from restriction:  $\text{CF}_3\text{-X}$  or  $\text{X-CF}_2\text{-X}'$ , where;

$\text{X} = -\text{OR}$  or  $-\text{NRR}'$  and

$\text{X}' =$  methyl ( $-\text{CH}_3$ ), methylene ( $-\text{CH}_2$ -), an aromatic group, a carbonyl group ( $-\text{C}(\text{O})-$ ),  $-\text{OR}''$ ,  $-\text{SR}''$  or  $-\text{NR}''\text{R}'''$ ;  
and where;

$\text{R/R}'/\text{R}''/\text{R}'''$  is a hydrogen ( $-\text{H}$ ), methyl ( $-\text{CH}_3$ ), methylene ( $-\text{CH}_2$ -), an aromatic group or a carbonyl group ( $-\text{C}(\text{O})-$ ).

## US Definition:

Any chemical substance or mixture that structurally contains at least one of the following three sub-structures:

- $\text{R}-(\text{CF}_2)\text{-CF}(\text{R}')\text{R}''$ , where both the  $\text{CF}_2$  and  $\text{CF}$  moieties are saturated carbons
- $\text{R-CF}_2\text{OCF}_2\text{-R}'$ , where  $\text{R}$  and  $\text{R}'$  can either be  $\text{F}$ ,  $\text{O}$ , or saturated carbons
- $\text{CF}_3\text{C}(\text{CF}_3)\text{R}'\text{R}''$ , where  $\text{R}'$  and  $\text{R}''$  can either be  $\text{F}$  or saturated carbons.

# EU PFAS Legislation - Persistent Organic Pollutants (POPs)

Implements the Stockholm Convention – bans or strictly limits POPs.

- Perfluorooctane sulfonate (PFOS) – banned since 2009.
- Perfluorooctanoic acid (PFOA), salts, and related compounds – banned from 4 July 2020.
- Perfluorohexane sulfonic acid (PFHxS), salts, and related compounds – listed and banned from 2023.

**Note:** Long-chain Perfluorocarboxylic Acids (LC-PFCAs) added to the convention in May 2025.

**Scope:** Manufacture, placing on the market, and use prohibited, except for narrow exemptions. Applies to products and waste containing listed PFAS above threshold limits.



# EU PFAS Legislation - REACH

## Annex XVII Restrictions

- C9–C14 perfluorocarboxylic acids (PFCAs), their salts and precursors. Applies from 25 February 2023 (with transitional periods).
- Perfluorohexanoic acid (PFHxA), salts, and related substances.

**Scope:** manufacturers, importers, and distributors of textiles, leather, paper, cosmetics. Threshold limits for PFHxA and PFCAs (measured as sum of substances).

- Firefighting foams from 23 October 2025: PFAS  $\geq 1$  mg/L prohibited for placing on the market/use in most applications, transitional periods varying by sector/use (18 months for training purposes, 3 years most industry & defence and 5 years for aviation and marine).



# PFAS Legislation in Force in the EU

## REACH Candidate List - Substances of Very High Concern (SVHCs)

- PFOA, perfluorinated carboxylic acids (C9-14 PFCAs) and PFHxS.
- Perfluoroheptanoic acid (PFHpA) and its salts.
- Perfluorobutane sulfonic acid (PFBS) and its salts, a replacement of PFOS.
- 2,3,3,3-tetrafluoro-2-(heptafluoropropoxy)propionic acid, its salts and its acyl halides (HFPO-DA)

## Requirements:

- Suppliers must notify recipients and consumers if an article contains >0.1% w/w of an SVHC (Article 33) which apply immediately.



# Toxic Substances Control Act (TSCA) 8(a)(7)



**Scope:** Manufacturers/importers into US, including substances and articles.

**Reporting:** Each chemical, for each year - 2011 – 2022 (including if the activity has ceased)

- Upload data between 13/04/2026 - 13/10/2026 (**Proposed delay to these dates**)
- Small businesses have until 13/04/2027 (**Proposed delay to these dates**)

**Information:** PFAS use, production volumes, disposal, exposures, and hazards: “Information known or reasonably ascertainable”.

Uses a structural definition (not a chemical listing), all chemicals (polymers, substances, mixtures etc) fall in scope if they fall under the structural definition. EPA provide a non-exhaustive inventory of PFAS.

Exemptions: PFAS in articles from US suppliers, US pharmacopeia, drugs medical devices, food additives, non commercial R&D

## Proposed exemption for PFAS in imported articles

- **Proposed exemption for PFAS substances and in mixtures at 0.1% or lower**
- **Proposed changes have not been formally implemented yet in law**

# TSCA 8(a)(7) - Key Obligations



Requirement	Who	What	When
Reporting	Manufacturer / importer of chemicals	PFAS uses, production volumes, byproducts, disposal, exposures, and existing information on environmental or health effects for any year since 1 January 2011, byproducts	13/10/2026? <b>(Proposed delay)</b>
	Importer of articles	<b>Proposed exemption: Likely to change</b>	13/10/2026? <b>(Proposed exemption)</b>
	Small importer of articles		13/04/2027? <b>(Proposed exemption)</b>
Record keeping	Everyone in scope	Retain records that document any information submitted to Environmental Protection Agency (EPA)	Five years following reporting date deadline.

# Minnesota PFAS Requirements



## Minnesota

- 01/01/2024: Firefighting foam and food packaging
- 01/01/2025: prohibition on sale of household, cosmetics, personal care, ski wax products, textiles furnishings, food packaging containing intentionally added PFAS
- Starts 01/07/2026 due 01/02/2027 each year reporting requirements for PFAS (product description, stock code and name, PFAS name, CAS number, amount, function, manufacturer contact details)
- From 01/01/2032 prohibition extends to any product unless there is an assigned Currently Unavoidable Use (CUU) code.
- Exemptions: Products already regulated within the scope of federal law such as medical devices.

# Maine PFAS Requirements



## Maine

- 01/01/2026: Prohibition on consumer products (household products, ski wax and personal care products) with intentionally added PFAS.
- Reporting requirements apply for products with a CUU code.
- From 01/01/2032, both states prohibit:
  - Products containing intentional PFAS for which mandatory information has not been reported.
  - All intentional uses of PFAS (some exceptions such as refrigeration/heating and propellants). Then complete phase out from 01/01/2040.
  - Unless recognised CUU. Proposed uses were due by 1 June 2025 for the 2026 prohibitions.
- Products exempted from 2032 prohibition include: Semiconductors, Motor and water vehicles, non-consumer lab equipment or electronics, products already regulated within the scope of federal law such as medical devices.

# New Mexico PFAS Requirements



## New Mexico

### Intentionally added PFAS

- 01/01/2032 comprehensive ban unless 'currently unavoidable use'

**Requires submission** (from 2027) of information to state, including product (including code), PFAS purpose & quantity, manufacture info, test results.

### Exclusions:

- Fluoropolymers that are solids at room temperature & pressure
- Industrial products such as cooling, heating, ventilation, air conditioning and refrigeration equipment to 01/01/2040
- Semiconductors and the materials used to manufacture them
- Non-consumer electronics and laboratory equipment.

# Other US State Universal PFAS Use Prohibitions



State	Use	Start Date	Requirement
<b>California</b>	1) Fiber-based food packaging 2) Cosmetics & personal care, most textiles, apparel and some juvenile products	1) 1/1/2023 2) 1/1/2025	1 & 2) Prohibition
	1) Outdoor apparel for severe wet conditions – labelling requirement	1) 1/1/2025	3) Label product
	1) Firefighting Gear 2) Outdoor apparel for severe wet conditions	1) 1/1/2027 2) 1/1/2028	4 & 5) Prohibition
	1) Juvenile product, textiles, food packaging and menstruation products: manufacturers / importers must prove & declare PFAS free	1) 1/7/2029	6) Register with regulator
	<b>Colorado</b>	1) Carpets, cosmetics, fabric treatments, food packaging, juvenile products, oil & gas fluids, upholstered furniture	1/1/2022
2) Cleaning products (with some medical exceptions), cookware, dental floss, menstruation products, ski wax Installation of any PFAS containing artificial turf. 3) Medical floor maintenance products, textile articles, food equipment for commercial kitchens, Outdoor apparel for severe wet conditions		2 & 3) 1/1/2025  2) 1/1/2026 3) 1/1/2028	Labelling and information provision to regulator  Prohibited in products

# Other US State Universal PFAS Use Prohibitions



State	Use	Start Date	Requirement
Connecticut	1) Outdoor apparel for severe wet conditions & firefighting turnout gear  All products listed in 2) below	1) 1/1/2026  2) 1 July 2026	Labelling and information provision to regulator by date
	2) For all consumer products including apparel, carpets & rugs, cleaning products, cookware, cosmetics, dental floss, fabric treatments, juvenile products, menstruation products, textile furnishings, upholstered furniture and ski wax	2) 1/1/2028	Prohibited for use
Illinois	Dental floss, Juvenile products, Menstrual products, Intimate apparel, Cosmetics  Proposed bill SB 117 will, if passed, expand scope beyond this	1/1/2032	Prohibited for use Exclusions: internal electronic components. All internal components sold for repair, used products resold in secondary markets

# US State Universal PFAS Phase-Out Timelines



State	Requires reporting or labelling?	Date of first use group all-PFAS ban	Proposed final phase out date (all uses)	Uses Currently Unavoidable Use “CUU” model for exclusions
Minnesota	Report from 1/7/2026	1/1/2025	1/1/2032	Yes
Maine	Report from 2025 (CUU)	1/1/2026	1/1/2032	Yes
New Mexico	Report from 2027	1/1/2032	1/1/2032	Yes
California	Labelling on cookwear from 2023, outdoor apparel from 2025	1/1/2023	No plans	No. Products for specific uses are banned
Colorado	Not required	1/1/2022	No plans	No. Products for specific uses are banned
Connecticut	Labelling of listed products 1/7/2026	1/1/2028		
Illinois	Not required	1/1/2032		

# Canada - PFAS Regulation Progress



**29 January 2025:** Reports were to be submitted to regulator, on PFAS in product sold in Canada in 2023.

## March 2025 'State of PFAS' report:

“...a precautionary, class-based approach to addressing PFAS is needed to protect the environment and people from anticipated adverse effects.”

## March 2025 Risk Management Approach:

“The class of PFAS, excluding fluoropolymers as defined in the State of PFAS Report, is recommended for addition to CEPA Part 2 of Schedule 1.”

Because PFAS are listed on Part 2, PFAS prohibitions will be developed use by use. No universal all-use PFAS prohibition is planned.

**Phase 1: Prohibition of the use of PFAS in firefighting foams not currently regulated** Consultation on Risk Management of PFAS completed, moving forward to restriction

**Phase 2: Targeted uses not yet announced. Consultation anticipated in 2027.**

## Exceptions

In transit across Canada and permit under Cross border Movement of Hazardous Waste and Hazardous Recyclable Material Regulations



# EU Proposed PFAS Restriction



- Proposed under REACH.
- Updated proposed restriction background document published June 2025, incorporating an additional 8 sectors compared to the initial document.
- Covers a universal ban with 18-month transition period
  - Includes manufacture, placing on the market and use
  - Covers nearly all remaining uses of PFAS not already regulated
  - Derogations granted for 5 or 12 years
  - Some derogations for an unlimited period of time
  - For some use sectors, risk control measures may be implemented in addition, which currently haven't been defined. We expect to see details after the SEAC consultation

# EU Proposed PFAS Restriction



## Phase 1 consultation SEAC draft opinion

- Closed. Evaluation completed Dec 2025
- Publication due March 2026, following SEAC Committee Meeting.

This discusses the original 14 sectors of use and not the additional 8 in the revised background document (Printing; Sealing; Machinery; Other medical; Military; Explosives; Technical textiles; Broader industry uses)

## SEAC consultation

- To cover all sectors and full scope of the Restriction and includes PFAS manufacturing.

Consultation submission via online survey excluding attachments.

Only socio-economic aspects will be considered.

60 days to submit comments from when the draft SEAC report is published.

## SEAC final opinion

- Publication due November/December 2026.

# EU Proposed PFAS Restriction



## Preparing for SEAC Consultation

- Strong stakeholder engagement is critical for the additional 8 sectors and other applications where evidence for lack of alternatives has been assessed as weak, in order for any derogations to be assigned.
- Stakeholders MUST provide answers to the questions on the form.
- End 2026: Socio-Economic Analysis Committee (SEAC) adopts final opinion.
- Survey Guidance Document (Published in December 2025)
- Use mapping (More detail will be published before the consultation).

# EU PFAS Restriction - Proposed Derogations

- **Fluorinated gas (F-gas) (mobile air conditioning and transport)** - 6.5 year derogation. It should be noted there is currently no restriction under the F-gas Regulation
- **Diagnostic and calibration equipment** - deleted to align with REACH article 67 (1) derogation for scientific research and development with no maximum quantity invoked.
- **Military** - applications have strong evidence for the lack of alternatives and a 13.5 year derogation.
- **Lubricants and lubricant additives - Industrial and professional uses** 13.5 year derogation.
- **Batteries** 13.5 year derogation.
- **Hard chrome plating** 6.5 year derogation.
- **Filtration and separation of air and other gases** 13.5 year derogation (excluding general (HVAC) ventilation).
- **Semiconductor manufacturing and photonics** 13.5 year derogation.
- **Industrial use in machinery applications** 13.5 year derogation.
- **Coatings on displays and lenses** 6.5 year derogation.
- **Spare parts** 20 year derogation or until the end of the product's service life.

## Note

13.5 years when no alternatives.  
6.5 years for possible substitution.  
No current way of extending derogations.

# UK PFAS Legislation

## Current Legislation

- (3,3,4,4,5,5,6,6,7,7,8,8,8-tridecafluorooctyl) silanetriol and any of its mono-, di- or tri-O-(alkyl) derivatives (TDFAs) in spray products above 2 ppb.
- UK has implemented the POPs convention so these PFOS, PFHxS, PFOA are restricted.

Uses includes firefighting foams placed on the market after 04/07/2020.

## Future Plan

“Align UK REACH with closest trading partners, especially the EU, by December 2028. Consider restrictions on PFAS sub-groups in line with existing EU measures.”

“HSE to publish and consult on relevant PFAS in summer 2026, aligned with the strategic approach. Additions to the UK candidate list to follow the HSE decision-making process within 45 days of consultation closing (expected autumn 2026).”



# Looking Ahead

## EU REACH Annex XVII Restriction

- Final SEAC Consultation March 2026. Adoption expected 2027
- Derogations modified by industry engagement, worthwhile engaging in the second consultation stage.

## UK Targeted Selective Measures

- UK plans to be closer to EU with respect to the EU's already regulated PFAS.
- Not currently considering universal PFAS ban, instead, regulating PFAS sub-groups.

## US

- Watering down at Federal level: reporting imported articles axed.
- Additional restrictions and reporting requirements expected in US states. Note the divergence of scope and timelines

## Commercial Considerations

Additional administrative burden with negative sales impact for PFAS containing parts.

Reduced production of PFAS may limit parts and materials availability.

# What Can Industry do About PFAS?

- Know the PFAS requirements in your markets and supply chain.
- If you plan to use a derogation, start preparing a site-specific management plan detailing PFAS use.
- Assess the risk to your business and manage the risk.
- Keep records of due diligence activities.
- **Respond to the SEAC consultation in March 2026.**
- Collate and record PFAS product and consumable data and comply with legislation on PFAS reporting and phase out.
- Research and develop alternatives to PFAS.
- Redesign to remove the need for the PFAS, use PFAS-free alternatives where possible.
- Keep up to date with the legislation: it is developing rapidly.



# Questions?



# Lets Talk



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