

## Guidance Note



**Fire Industry Association**

Leading Excellence in Fire Since 1916

## **Environmental Guidance Legislative overview**

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## 1 Scope

This guidance note replaces the earlier 2009 overview with the latest UK-specific legislation post-Brexit. It focuses on England and Wales; separate rules apply in Scotland and Northern Ireland. A good place to start would be the Environment Act 2021.

It is not intended to be a full and complete list of possible legislative requirements but to increase members' awareness of the legislation that may affect fire protection companies. It is the responsibility of all companies to ensure that they discharge their legal requirements under these and other applicable legislation. The document is written from an Environmental Protection standpoint and does not include requirements related to the Health and Safety at Work Act.

This guidance summarises key UK environmental laws that affect fire protection companies. It covers:

- Climate change controls;
- Sustainable design requirements;
- Pollution permitting;
- Waste-management regimes;
- Chemical-product restrictions.

Companies must ensure full compliance with all applicable statutes and any sector-specific guidance.

## 2 Background

UK environmental law now consists of:

- Retained EU regulations (with UK amendments)
- New UK domestic regulations

Devolved administrations' rules in Scotland and Northern Ireland

Legislation is grouped by topic:

- Ozone-depleting substances;
- Fluorinated greenhouse gases (F-gases);
- Eco-design and construction products;
- Integrated pollution control;
- Waste, WEEE, batteries and hazardous waste;

- UK RoHS and UK REACH.

### **3 Legislation**

Annex A contains an overview of the applicable European/UK Legislation.

#### **3.1 Climate change**

##### **3.1.1 Ozone depleting substances**

- The Ozone-Depleting Substances Regulations 2007 (as amended 2015) ban halon in new fire-suppression systems.
- Critical uses (defence, aviation) remain under strict license from the Department for Environment, Food & Rural Affairs (DEFRA).
- Personnel must hold F-Gas and ODS qualifications listed in the 2009 and 2015 Regulations.

The FIA is listed as the training body for fire protection in these regulations.

##### **3.1.2 F-gases**

The Fluorinated Greenhouse Gases Regulations 2015 (amended 2020) transpose EU 517/2014 into UK law with tailored UK provisions for labelling, leak-testing and reporting.

FIA remains an approved training body for company certification and technician qualifications.

Key requirements:

- Leak checks on stationary fire systems;
- Record-keeping of gas charged, recovered and destroyed;
- Certification of personnel and companies.

#### **3.2 Sustainable development & product design**

##### **3.2.1 Eco-Design Directive (2009/125/EC)**

The Eco-design for Energy-Related Products Regulations 2021 implement EU 2009/125/EC post-Brexit with UK-only updates. The EU has the Ecodesign for Sustainable Product Regulation (ESPR) 2024/1781.

- Manufacturers should integrate environmental considerations throughout the product lifecycle, including the sourcing of raw materials, manufacturing processes, transportation, use phase, and end-of-life recovery and recyclability.

### 3.3 The Construction Products (Amendment) Regulations 2022

The Construction Products (Amendment) Regulations 2022 (UKCPR) replaces the EU CPR for UK markets.

- CE and/or UKCA marking are acceptable markings for new products placed on the market since 1 January 2023.
- Fire detection & alarm and fire extinguishing/suppression equipment covered by harmonized product standards must comply with Essential Requirement 2 (fire safety) plus applicable structural, health and durability clauses.

### 3.4 Integrated Pollution Prevention & Control (IPPC)

- The Environmental Permitting (England and Wales) Regulations 2016 (EPR 2016) consolidate PPC and waste-licensing.
- Activities in combustion, chemicals manufacture, waste treatment and other sectors require an Environmental Permit.
- Permit conditions are based on Best Available Techniques (BAT) and include emission limits, monitoring, accident-prevention and site restoration.

### 3.5 Waste and pollution control

#### 3.5.1 WEEE Regulations

The Waste Electrical and Electronic Equipment Regulations 2013 (amended 2018 & 2024) cover smoke detectors, control panels and other Category 9 instruments.

Obligated producers must:

- Label products with the crossed-out wheelie-bin symbol;
- Finance collection, treatment and recycling;
- Report tonnages annually to the Environment Agency.

#### 3.5.2 Hazardous Waste

Hazardous Waste (England and Wales) Regulations 2005 (amended 2009 & 2021) govern classification, storage, consignment and disposal.

- HFC 227ea, HFC 23 and other F-gases are coded under EWC 14 06 01 and require consignment notes retained for three years.
- Fire companies transporting client waste must register as waste carriers/pay the (registration and renewal) fee, where appropriate. This fee varies in the devolved administrations.

### 3.5.3 Packaging and Packaging Waste Requirements

Manufacturers and importers must comply with evolving packaging legislation aimed at reducing waste and improving recyclability.

- Under the Packaging and Packaging Waste Regulation (EU) 2025/40, stricter targets for recycled content, material labelling, and reuse will apply to products placed on the EU market.
- In the UK, the Extended Producer Responsibility (EPR) scheme for packaging requires producers to take full financial responsibility for the collection, sorting, and recycling of packaging waste. Obligations include accurate data reporting, use of recyclable materials, and payment of modulated fees based on environmental performance. Organisations should review packaging design to minimise non-recyclable components and ensure compliance with both UK and EU requirements where applicable.

### 3.5.4 Environmental Act 2021

Whilst the Environment Act 2021 doesn't directly target fire protection companies, its ripple effects are starting to shape how they operate, especially those involved in construction, building maintenance, and compliance services.

The main considerations for fire protection companies include, but not limited to:

#### Environmental Reporting and Compliance

- The Act introduces a framework for legally binding environmental targets on air quality, water, biodiversity, and waste reduction.
- Businesses supplying to public sector or large corporate clients may need to demonstrate alignment with these targets through environmental performance reporting, sustainability credentials, and evidence of compliance with procurement standards.
- Local authorities and regulators increasingly require contractors to show how their operations support Net Zero and biodiversity objectives.

#### Waste and Resource Efficiency

- The Act embeds circular economy principles, requiring reductions in resource use and waste generation across construction and refurbishment projects.
- Fire protection companies should review processes for removal and disposal of old fire systems, extinguishers, and associated packaging, ensuring compliance with waste segregation and recycling obligations.
- Expect tighter controls on hazardous waste streams and potential requirements for reuse or recovery of components where feasible.

### 3.5.5 Battery Directive

The Batteries and Waste Batteries Regulations 2009 amended 2025 require separate collection and disposal of batteries. EU has later regulations.

- Products must display the separate-collection symbol and indicate presence of cadmium, mercury or lead above threshold levels.
- Manufacturers should design for easy battery removal and provide take-back points.



## 3.6 Other environmental aspects

### 3.6.1 Restrictions on Certain Hazardous Substances (ROHS)

The Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment Regulations 2012 (as amended 2020) controls lead, cadmium, mercury, hexavalent chromium, PBB and PBDE.

- RoHS 3 (2015 recast) removed previous exemptions for Category 9 equipment; compliance has been mandatory since 2019.
- Manufacturers must maintain technical documentation and conduct conformity assessments.

### 3.6.2 Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

Requires registration of substances covered by REACH, some may be used in fire products.

Registration is subject to the meeting all of the following criteria:

1. Classed hazardous substances or materials that are anticipated to be released from the product and pose a risk to human health or the environment under normal or reasonably foreseeable conditions of use, including end-of-life disposal; and
2. Used/imported in quantities >1 tonne/year; and
3. Present at >0.1% w/w concentration and listed as hazardous.

### 3.6.3 PFAS (Per- and Polyfluoroalkyl Substances)

PFAS are a large group of fluorinated chemicals widely used for their fire-resistant and water-repellent properties, including in some firefighting foams and fire suppression systems. Under UK REACH, PFAS are subject to increasing regulatory scrutiny due to their persistence and potential environmental and health impacts.

Key points:

- **Registration and Restrictions:** PFAS substances may require registration if manufactured or imported at  $\geq 1$  tonne/year. Many PFAS are candidates for restriction under UK REACH, with a public consultation on firefighting foams underway and phase-out dates expected from 2026 onwards.
- **Article Duties:** If PFAS are present in articles above 0.1% w/w and listed on the Candidate List, suppliers must communicate safe-use information to downstream users.
- **Alignment with POPs:** Certain PFAS (e.g., PFOS, PFOA, PFHxS) are already banned under the UK POPs Regulation, with strict deadlines for removal and disposal of legacy foams.
- **Industry Guidance:** Refer to the [FIA Fire Extinguishing Guidance on PFAS](#) for best practice in identifying, managing, and transitioning away from PFAS-containing products.
- **Further Information:** <https://www.gov.uk/government/publications/pfas-guidance>

### 3.6.4 Environmental Product Declarations (EPD)

Environmental Product Declarations (EPDs) are becoming increasingly important as circular economy principles and sustainability requirements gain prominence across the fire safety industry.

An EPD is a standardised, transparent, and independently verified document that communicates the environmental impacts of a product throughout its entire lifecycle, raw materials, manufacturing, transport, use, and end-of-life. EPDs support informed decision-making and demonstrate compliance with sustainability goals.

- While EPDs are not yet mandated for fire safety products in Great Britain, they are emerging in European legislation. The EU Battery Regulation (Regulation (EU) 2023/1542) introduces requirements for a digital battery passport and carbon footprint disclosure starting in 2026/2027 for certain battery types. These measures apply in the EU and Northern Ireland under the Windsor Framework, but do not currently apply in GB.
- EPD requirements are expected to expand to other product categories in the coming years, aligning with broader circular economy and sustainable procurement initiatives.
- Euralarm has published FAQs on EPDs, available via the members' area of its website or on request for non-members.
- Manufacturers should begin preparing by collecting lifecycle data and aligning with recognised standards such as EN 15804 for construction products.

### 3.6.5 Carbon Border Adjustment Mechanism

The UK Carbon Border Adjustment Mechanism (UK CBAM) is a levy starting 1 January 2027 on carbon-intensive imports (e.g., aluminium, cement, fertiliser, hydrogen, iron & steel) to align their embodied emissions' price with the UK ETS—ensuring fair competition for UK businesses and deterring carbon leakage.

## 4 Sources of Further information

The following websites provide more information on environmental issues and legislation.

- Gov UK

<https://www.gov.uk>

- Department for Environment Food Rural Affairs

<https://www.gov.uk/government/organisations/department-for-environment-food-rural-affairs>

- Environment Agency

<http://www.environment-agency.gov.uk/>

- Scottish Regulations

<http://www.scotland.gov.uk/>

- Scottish Environment Agency

<http://www.sepa.org.uk>

- Northern Ireland DAERA

<https://www.daera-ni.gov.uk/articles/northern-ireland-environment-agency>

### DISCLAIMER

*The information set out in this document is believed to be correct in the light of information currently available, but it is not guaranteed and neither the Fire Industry Association nor its officers can accept any responsibility in respect of the contents or any events arising from use of the information contained within this document.*

<https://www.gov.uk/guidance/extended-producer-responsibility-for-packaging-who-is-affected-and-what-to-do>

## Annex A

