

**Guidance
Note**



Fire Industry Association

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**FIA Guidance Document –
Foam Extinguisher Restrictions Briefing**

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To help understanding of the current restrictions on foam in UK fire extinguishers

1. TWO RESTRICTIONS ARE ALREADY IN PLACE, THESE ARE:

Perfluorooctane sulfonate (PFOS)

PFOS was listed as a persistent organic pollutant (POP) in Annex B (restriction) of the UNEP Stockholm Convention on POPs in 2009. Fire-fighting foams that were placed on the market before 27 December 2006 could also be used until 27 June 2011. Any firefighting foams containing PFOS should have been removed from use prior to June 2011 and ethically disposed of.

- You shouldn't have any of these but check with your extinguisher service provider.

Perfluorooctanoic acid (PFOA) in foam; "C8" chemistry

This 2020 legislation relates to any substances that can degrade to produce PFOA which includes 'long chain' C8 fluorinated Firefighting foams. In summary, C8 fluorinated foams will no longer be able to be used after 1st January 2023 unless the end-users e.g. FRS's can guarantee the containment of the foam and subsequent run off. In addition, the use of PFOA, its salts and PFOA-related compounds shall be allowed in fire-fighting foam for Class B fires already installed, until 4 July 2025, subject to the following conditions:

- a. fire-fighting foam that contains or may contain PFOA, its salts and/or PFOA-related compounds shall not be used for training.
- b. fire-fighting foam that contains or may contain PFOA, its salts and/or PFOA-related compounds shall not be used for testing unless all releases are contained.
- c. as from 1 January 2023, uses of fire-fighting foam that contains or may contain PFOA, its salts and/or PFOA-related compounds shall only be allowed in sites where all releases can be contained.
 - Most extinguishers containing PFOA being maintained under service contract will have been replaced or refilled using "C6" foam already – ahead of the deadline.
 - Check with your extinguisher service provider.
- d. fire-fighting foam stockpiles that contain or may contain PFOA, its salts and/or PFOA-related compounds shall be managed in accordance with Article 5.

These are currently being considered by the European Chemicals Agency (ECHA). The FIA is involved with all, has submitted assisting evidence and is keeping a close eye on their progress. We can only estimate the possible timelines if restrictions are laid down.

2. POSSIBLE RESTRICTION OF PFHxA (FOAM WITH C6 CHEMISTRY)

This consultation period has just concluded. Recommendations will be submitted to the Commission in 2022. Any changes needing to be made will be publicised in 2023 along with a transition timetable which, from experience, will conclude toward the end of the decade. The UK is likely to mirror the conclusions.

3. POSSIBLE RESTRICTION OF PER- AND POLYFLUOROALKYL CARBON-CHAIN MOLECULES (PFAS) IN FIRE-FIGHTING FOAM

This consultation period has just concluded. Recommendations will be submitted to the Commission in 2022. Any changes needing to be made will be publicised in 2023/24 along with a transition timetable which, from experience, will conclude toward the end of the decade. The UK is likely to mirror the conclusions.

4. POSSIBLE RESTRICTION OF PER (AND POLY) FLUOROALKYL SUBSTANCES (PFAS) CARBON-CHAIN MOLECULES IN FIRE-FIGHTING FOAM

DEFRA and HSE are running the UK consultation at the time of writing in conjunction with the EU. The Fire Industry Association has submitted assisting evidence. Recommendations are likely to be submitted to the government in 2023. Any resulting changes needing to be made will be publicised in 2024/25 along with a transition timetable which, from experience, will conclude around the turn of the decade. However, if either or both the above consultations conclude with restrictions being placed on fire-fighting foam in extinguishers (see sections 2 and/or 3), then they will come into force earlier and take precedent.

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.



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