

Submitted via digital portal

Fuels Industry UK

1 Castle Lane

London

SW1E 6DR

020 7269 7600

Email: simon.wood@fuelsindustryuk.org

07th September 2026

Socioeconomic impact of UK REACH restriction on PFAS in firefighting foam

Fuels Industry UK represents the companies that manufacture and supply over 85% of the UK's transport fuels, investing in sector-wide transformation to help the country reach net zero. That includes conventional and lower carbon alternative fuel suppliers alongside terminal and pipeline operators.

Member companies range from the operators of the major oil refineries in the UK through to heating fuel suppliers and LNG importers; owning around 1,250 of the UK's 8,000 filling stations. They have invested over £9 billion in the UK over the last ten years and employ 100,000 people across the UK sector.

Fuels Industry UK is pleased to submit a brief response covering the proposal in the consultation addressing chemical analytics and laboratories.

Fuels Industry UK notes that the definition of PFAS follows the OECD definition. The OECD definition fits between 10,000 to 15,000 different PFAS compounds. Currently, it is **not** possible to undertake:

- an analysis that will identify all the 10,000 and 15,000 compounds individually;
- an analysis that will give a result for a Total (all of those 10,000 and 15,000) PFAS.

It **is** currently possible to undertake:

- Targeted analysis for individual PFAS compounds;
- SUM of PFAS by aggregating individual compounds from a single analytical method;
- Screening tests for fluorinated compounds (e.g. Adsorbable Organic Fluorine). However, this will also measure other fluorinated compounds that are not PFAS.

The UK REACH proposal acknowledges this issue in the Background Document [Section 6.3.3.1 REACH restriction options (RO1, RO2a and RO2b)]. However, it does not provide a clear conclusion on how the results should be addressed, and the

terminology is subsequently used incorrectly in the Risk Assessment Committee (RAC) / Socio-Economic Analysis Committee (SEAC) conclusion. We have identified two specific issues present in the proposal for the restriction where this analytical / definition is important. They are:

1. the definition of **“total organic fluorine from PFAS”**; and
2. labels proposal to state **“WARNING: Contains per- and polyfluoroalkyl substances (PFAS) with a concentration equal to or greater than 1 mg/L for the sum of all PFAS”**.

As with the European Restriction, both issues present significant implementation and enforcement challenges unless they are revised to better reflect current analytical capabilities.

POINT 1 – for the definition of “total organic fluorine from PFAS” – analytical methods cannot distinguish the PFAS-derived fraction from an analysis of Total Organic Fluorine – so **“total organic fluorine from PFAS”** cannot yet be currently scientifically measured. The Background document acknowledges this limitation. Therefore, the current definition does not align with available analytical science and may create uncertainty regarding compliance and enforcement. This issue is particularly important because the parameter is proposed for use in both market/use restrictions and in assessing decontamination effectiveness.

SUGGESTION – If the regulatory intent is to address that sampling only comes from concentrate / wastewater / made up foam, then **Total Organic Fluorine** may be used as a proxy for PFAS, provided this limitation is clearly acknowledged. However, the restriction should avoid the term **‘from PFAS’** as that cannot currently be discriminated. This limitation is explicitly stated in the Background Document.

POINT 2 – labels that will state **“WARNING: Contains per- and polyfluoroalkyl substances (PFAS) with a concentration equal to or greater than 1 mg/L for the sum of all PFAS”** present practical implementation challenges. A “sum of PFAS” can only be consistently calculated if the specific PFAS compounds included in the sum are clearly defined. In the UK, where regulatory requirements refer to a PFAS sum (e.g. the UK DWI Drinking Water lists) the compound list making up the sum is specified.

SUGGESTION – Specify the PFAS compounds that must be included when calculating the “sum of PFAS”, or reference an established BSI / ISO standard that lists which PFAS are included in a sum.

Yours sincerely,

Simon Wood

Environment Health and Safety Specialist