

Fact sheet

Euralarm position on ECHA proposal for restriction of PFAS within the EU, submitted by Germany, Netherlands, Denmark, Sweden, and Norway

Introduction

On 7th February 2023, ECHA (the European CHemical Agency for the EU and EEA countries of Iceland, Lichtenstein, and Norway) – an agency of the European Union – published a proposal for restriction of PFAS within the EU, submitted by Germany, Netherlands, Denmark, Sweden, and Norway. PFAS are a group of thousands of mainly man-made substances that are used in numerous applications worldwide. The proposal is very broad and covers many different applications of PFAS on 1,780 pages.

Within the initial proposal, the applications of PFAS are grouped into 14 sectors: TULAC (Textile, upholstery, leather, apparel and carpets) - Food contact materials and packaging - Metal plating and manufacture of metal products - Consumer mixtures - Cosmetics - Ski wax - Applications of fluorinated gases - Medical devices - Transport - Electronics and semiconductors - Energy sector - Construction products - Lubricants - Petroleum and mining. This document serves as brief overview summary with a focus on firefighting gases as part of the sector group 'Applications of fluorinated gases'.

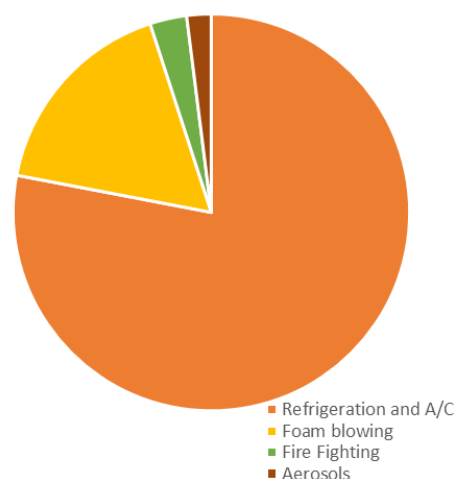
In June 2025, the so-called Background Document (version 14) was made public. This document is the evolution of the initial restriction proposal (request from the Dossier submitters) and, as such, it incorporates the updated proposal following the comments received during the first consultation process. Eight new sectors are considered in the proposal, and it appears that no specific evaluation will be carried out by ECHA's committees -of the added eight- in the ongoing opinion making process. In addition, the proposals for restrictions have changed for the existing different sectors.

Note: This document does not cover firefighting foams which are part of a separate restriction process. In addition to the REACH work, UK HSE have started their consultation on firefighting foams and a more general proposal will follow.

What firefighting gases are included in the proposal?

The 'Application of fluorinated gases' sector includes commonly used and new fluorinated gases, as well as part of their blends. The respective firefighting gases are covered by EN 15004 or ISO 14520 under the following designations:

- HFC-227ea, example tradenames: FM-200™, MH227®, FE-227™, Solkaflam®227
- HFC-125, example tradename: Ecaro-25®
- FK-5-1-12, example tradenames: Novec™1230, Dukare®1230, Noah®5112, MH5112®, Kectone 5112™
- HB-55, example tradename: Solstice®Quench 55



Application of fluorinated gases sector

How are fluorinated gases used in firefighting considered within the proposal?

Within the sector group, 'Application of fluorinated gases', 3% relates to firefighting gases. This is extremely low compared to other applications in this sector group such as refrigeration and foam blowing.

Gaseous extinguishing systems are, by application, non-emissive until required to fight fires; the FSTOC 2022 Assessment Report estimates that annual emissions from the fire protection bank is 3% (i.e., a nominal 3% of 3% of the 'Application of fluorinated gases' sector).

Annex E of the restriction proposal recognises particularities for firefighting applications. Table E.125 of updated Annex E sets out the analysis of alternatives as clean fire suppressants, and whilst recognising there are alternatives to F-Gases it notes that there are still applications that will require them stating:

"However, for some applications these alternatives are not technically feasible..., and therefore concludes:

"High substitution potential at EiF for some uses [sufficiently strong evidence] and low substitution potential at EiF for other applications and for the maintenance and repair of existing equipment originally designed to use PFASs [sufficiently strong evidence]"

Thus, the updated proposal's recommendation for clean fire suppressants applications is:

- No general derogation is proposed based on strong evidence for a high substitution potential for many applications of clean fire suppressants.
- Unlimited derogation for maintenance or refilling of existing equipment, including fire suppression (this is new), based on strong evidence pointing to the unavailability of suitable drop-in alternatives.
- Derogation is for 18 months + 12 years (this was already in the original proposal) based on sufficiently strong evidence that there is a low substitution potential some specific applications of clean fire suppressants where alternatives damage the assets or pose a risk to human health, this situation includes aviation, data centres, cultural/historical archives.

The rationale behind this recommendation is:

- The need for confidence in fire safety systems, which indicates potential for significant welfare.
- To limit significant risk on human life.
- To avoid potential destruction of valued assets damaged by fire or other fire suppressants.

Process being followed

1. Public consultation for the restriction proposal started on 22 March 2023 and closed 25 September 2023.
2. Opinion development in ECHA's committees in parallel.
3. ECHA draft opinion consultation, which is taking longer than was expected.
4. ECHA plans to launch a consultation on the draft opinion by SEAC for a further 60 days following their March 2026 meeting.
5. Submittal to EU Commission, followed by a voting process in European Parliament and Council culminating in Entry into Force (EiF).
6. An 18-month transition period, following EiF, before the general ban affecting all PFAS.
7. Following the transition period, derogations for specific uses e.g. 12 years for firefighting applications.

Draft		Public Consultation		Opinion development			Draft opinion consultation		Legislative process		Entry into force
Q1 2023		Q2 2023	Q3 2023	Q4 2023	All 2024	All 2025	Q1 2026	Q2 2026	H2 2026	H1 2027	2028/2029

Conclusion

In light of the current information available, considering the actual proposal and the drafted timeline, it appears that an EiF for legislation is not likely to be implemented before 2028/2029. Therefore, in the restriction proposal, fluorinated gases such as FK-5-1-12 or HB-55 which are not restricted by the F-Gas regulation are expected to be available for use in new systems in specific applications at least until 2041 and unlimited for service and maintenance of existing systems of all systems before 2041 (taking into account the above recommendation on transition period and derogation).

Euralarm supports the position from ECHA, during their webinar, that in the current proposal there is no intent to mandate the removal of installed systems, and, in the same line, the new proposal from the submitters to allow for unlimited maintenance and refilling of installed systems.

ECHA [reported](#) that by the end of its stakeholder consultation on the [proposed restriction](#) on PFAS on 25 September 2023, it had received more than 5,600 comments from more than 4,400 organisations, companies and individuals.

Of these, 3,313 were from companies, 1,543 from individuals, 552 from trade associations, 61 from NGOs, 42 from academia, 30 from national authorities, 30 from international organisations, 21 from regional or local authorities, and 50 were considered as uncategorized submissions.

The top three countries by number of submissions were Sweden, with 1369 submissions, Germany, with 1298 submissions, and Japan, with 938 submissions. The number of submissions from Sweden included a very high number of individual submissions, due to a public submission campaign in the country.

The Stakeholder comments are feeding the scientific opinions that ECHA's Committee for Risk Assessment (RAC) and Committee for Socio-economic Analysis (SEAC) would prepare to assess the proposal.

Before finalising its opinion, SEAC would submit a draft version of the opinion to a 2-month consultation which is planned for spring 2026, after their meeting in March 2026.

RAC and SEAC began a review of the various sectors starting in March 2024. This schedule evolved and the list below indicates the program followed:

- **March 2024** meetings:
 - Consumer mixtures, cosmetics and ski wax;
 - Hazards of PFAS (only by RAC); and
 - General approach (only by SEAC).
- **June 2024** meetings:
 - Metal plating and manufacture of metal products; and
 - Additional discussion on hazards (only by RAC).
- **September 2024** meetings:
 - Textiles, upholstery, leather, apparel, carpets (TULAC);
 - Food contact materials and packaging; and
 - Petroleum and mining.
- **November 2024** meetings:
 - Textiles, upholstery, leather, apparel, carpets (TULAC);
 - Food contact materials and packaging; and
 - Construction products
- **March 2025** meetings
 - Fluorinated Gases, Energy and Transport
- **June 2025** meetings
 - Medical devices
 - Lubricants (only RAC)
 - Transport (continued only SEAC)

- **September 2025** meetings
 - Electronics and semiconductors
 - PFAS manufacturing
 - Horizontal issues (enforceability, concentration limits and analytical methods)
 - Energy (continued SEAC)
 - Lubricants (continued SEAC)

After September it is expected PFAS manufacturing and Horizontal issues will be further discussed by both RAC and SEAC and Electronic and Semiconductors will be treated by SEAC (continued).

More information about the committees' plans to evaluate the remaining sectors and about the next procedural steps will be announced as work advances. At the same time, the five national authorities who prepared the proposal, have updated their initial report to address the consultation comments. This updated report will be assessed by the committees and will serve as the foundation for their opinions.

As this is a development process, Euralarm is committed to closely monitor the progress and inform interested parties regularly about changes.

DISCLAIMER

The information in this document has been summarized by Euralarm [May 2023 – September 2025] and is intended for informational purposes only. Some of the information may become outdated and may not reflect the most current developments. Full details of the PFAS restriction proposal can be found on ECHA website <https://echa.europa.eu/en/home>. This document is for information purposes only and in no way constitutes a warranty of quality or a statement about the quality of products, services and/or named entities. Any claims arising from this document are expressly excluded.

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Note: The English version of this document is the approved Euralarm reference document.

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