

Disposal of Fire-Fighting Foam Media (UK & Europe)



EXTINGUISHING SECTION

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FOREWORD

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

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1. Scope

This document provides guidance for the safe and compliant handling, storage, transport, and disposal of fire-fighting foam media in accordance with UK, EU legislation, and applicable European fire protection standards.

Applies to all water-based media, including:

- AFFF / FFFP (fluorinated foams)
- Fluorine-free foams (F3 / SFFF)
- Class A and Class F foams
- Wetting agents and water-additives.

2. Applicable Standards and Legislation

2.1. European Fire Standards

- EN 3 – Portable fire extinguishers
- EN 1568 – Fire extinguishing media (foam concentrates)
- EN 13565 – Fixed firefighting systems (foam systems)

2.2. Environmental and Waste Legislation

2.2.1. UK

- Environmental Protection Act 1990,
- Groundwater Regulations 2009,
- UK REACH, POPs Regulations

2.2.2. EU/EEA:

- REACH (EC) 1907/2006
- POPs Regulation (EU) 2019/1021
- Waste Framework Directive 2008/98/EC
- Water Framework Directive 2000/60/EC
- Industrial Emissions Directive 2010/75/EU
- ADR (Dangerous Goods Transport)

2.3. PFAS Controls

- PFOS – banned *Directive 2006/122/EC of the European Parliament and of the Council of 12 December 2006 amending for the 30th time Council Directive 76/769/EEC on the approximation of the laws, regulations and administrative provisions of the Member States relating to restrictions on the marketing and use of certain dangerous substances and preparations (perfluorooctane sulfonates)*. EU & UK
- PFOA – prohibited from July 2025 *Commission Delegated Regulation (EU) 2025/1399 of 5 May 2025 amending Annex I to Regulation (EU) 2019/1021 of the European Parliament and of the Council as regards perfluorooctanoic acid (PFOA), its salts and PFOA-related compounds*. EU & UK
- PFHxA - *Commission Regulation (EU) 2024/2462 of 19 September 2024 amending Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council as regards undecafluorohexanoic acid (PFHxA), its salts and PFHxA-related substances*. EU only
- Firefighting foams - *Commission Regulation (EU) 2025/1988 of 2 October 2025 amending Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council as regards per- and polyfluoroalkyl substances in firefighting foams*. EU only

Broader PFAS restrictions under development across Europe. PFAS-containing foams are considered persistent and environmentally hazardous.

3. Core Environmental Principles

- Zero uncontrolled discharge
- Full containment at all times
- Protection of groundwater and surface water
- Strictly Prohibited
- Discharge to soil, grass, or hard surfaces
- Disposal to surface water or storm drains
- Uncontrolled release during testing or training

4. Waste Classification

Foam waste is typically:

- Hazardous waste (especially PFAS-containing foam)

Must be classified using:

- European Waste Catalogue (EWC)
- Hazardous Waste Regulations

5. Approved Disposal Routes

5.1. High-Temperature Incineration (Preferred Standard)

Primary and often mandatory method $\geq 1100^{\circ}\text{C}$ destruction for PFAS-containing foam.

Must be carried out at licensed facilities and is required for PFAS foams (AFFF), Legacy stocks and Contaminated washings.

5.2. Licensed Hazardous Waste Treatment

Specialist treatment permitted where approved and must comply with environmental permits.

5.3. Foul Sewer Disposal (Restricted Use)

Only permitted if foam is PFAS-free and non-hazardous, environmental permits are in place and local authority approval obtained. However, this is increasingly discouraged and being phased out.

6. Handling and Containment

6.1. On-Site Requirements (EN-aligned)

Contain all discharges during servicing/testing, use bunding, drain covers, or containment units and prevent entry to drainage systems.

6.2. Storage

Use sealed, labelled containers, store in bunded areas and segregate hazardous foam (PFAS).

6.3. Transport

Comply with ADR regulations (UN 1044), use licensed waste carriers, secure extinguishers/containers and maintain full documentation (consignment notes).

6.4. Waste Collection Options

Portable fire extinguishers: Remove extinguishers intact for disposal, replace and collect units for processing, decant into sealed containers for bulk disposal.

Foam systems: collect all end of use foams, decant into sealed containers for bulk disposal.

7. Servicing and Testing

7.1. Portable Fire Extinguishers

7.1.1. Annual Servicing

Minimise foam discharge, reuse media where compliant and collect all waste.

7.1.2. Extended Service

No uncontrolled discharge permitted, contained discharge, collection for disposal.

7.2. Fixed Systems (EN 13565)

Must include bunding or containment, allow safe recovery of foam during maintenance.

8. Best Practice (European Expectation)

- Transition to fluorine-free foams (F3)
- Remove legacy PFAS-containing foam stocks
- Eliminate training discharge to environment
- Use closed-loop recovery systems
- Contain all foam
- Prevent environmental release
- Treat PFAS foam as hazardous waste
- Use licensed disposal routes
- Prefer high-temperature incineration

9. Basis for Handling and Disposal of Fire Extinguishing Foam

All fire-fighting foam must be contained, treated as potentially hazardous, and disposed of through authorised hazardous waste processes in line with European standards and environmental legislation.



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