



PFAS

PFAS restriction proposal: 5 red flags from the recent update

The European Chemicals Agency recently published an update to the EU-wide PFAS restriction proposal, which included some pretty eye-catching changes. Unfortunately, not for the better. Here are 5 key takeaways from the 3,500+ page document.

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August 20, 2025. Hot weather and packed European beaches. Everyone on vacation. Perfect timing for the European Chemicals Agency (ECHA) to publish [an update to the background document](#) of the ever-so-important EU-wide PFAS restriction proposal.

The five EU Member States responsible for the monumental “PFAS dossier” had now gone through the record-breaking 5,600 replies from the public consultation period and updated the background document accordingly. Their concluding recommendation for the PFAS ban? To include all PFAS uses and substances.

Fast-forward one week (they need to act fast before people come back from their summer holidays). [ECHA announces that it will split the restriction](#), leaving out eight categories of PFAS uses from its assessment of the ban. Not exactly what the dossier submitters had in mind. The comprehensive, holistic approach of the restriction proposal went straight out the window. [A terrible decision.](#)

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So, is the update to the background document now irrelevant? Not at all. It will guide the entire restriction process moving forward, making it the most important piece of text to dig into and decipher. But let's be frank here, it is a brick.

In case you think 3,544 pages is a bit long and you don't have time to read the whole thing — don't worry. ChemSec has done it for you. Here are five key takeaways from the update.

1. In urgent need of a PFAS restriction

As a huge surprise to no one — we need to deal with the PFAS crisis now. It's one of the biggest environmental challenges of our time and there is no time to waste.

The updated dossier makes abundantly clear that there is an “urgent need for minimisation” of the production and use of PFAS, which represent “a threat of irreversible damage for future generations” owing to their extreme persistence in the environment.

These “forever chemicals” have contaminated our waters and our soil, they are in the food we eat and even in our blood. If we don't “turn off the tap” now, these levels will continue to rise.

2. Big, gaping export loopholes

The updated dossier states that PFAS producers can continue to produce for export to non-EEA countries indefinitely, regardless what it will be used for. This makes no sense (even from a strictly EU perspective). We live in a global world and EU citizens will continue to be exposed.

It's actually quite outrageous to offer this loophole to PFAS producers in the EU. The purpose of the PFAS restriction is simple: turn off the tap to stop PFAS use and emissions. Granting derogations for continued production runs directly counter to that goal.

The export derogation is especially shocking. It essentially hands the PFAS industry a free pass to keep producing forever chemicals, with emission limits they set for

themselves. These emission limits would then be locked in indefinitely and never updated(!). This ignores both technological progress and the principle of best available techniques, pretending technology and cleaner solutions stay the same and don't improve over time.

We already know where this road leads. Across Europe, [around 23,000 contaminated sites](#) have been documented, many caused by production plants that polluted the water and harmed local communities. Choosing to allow even more unlimited production and emissions in the future doesn't protect EU citizens — it repeats the very mistakes that got us here.

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3. Emission control is wishful thinking

The focus on emission control during manufacture is highly disappointing. Whenever real solutions are off the table, industry always falls back on “emission control” as the magic fix. But history shows again and again that it doesn't work.

Just look at Parkersburg in the United States (the story behind the movie *Dark Waters*), Miteno-Trissino in Italy, or Dordrecht in the Netherlands. Each one a reminder that “controlling” PFAS emissions is just a type of wishful thinking — and a very expensive one at that.

What's even more ironic is the cost argument. Companies constantly complain about the expense of basic transparency or registering their chemicals but somehow have no problem spending hundreds of millions on emission control measures like underground walls.

4. Too many exemptions in the PFAS restriction

The updated dossier gives out far too many long-term derogations for PFAS uses. Instead of cutting pollution quickly, this approach slows everything down and leaves both people and the environment exposed for decades to come.

Right now, there are 86 derogations on the table — some of them without any time limits at all, essentially allowing continuous pollution. Others are so broad they're meaningless. Take “wires and cables” for example: this single category now gets 13 and a half years of extra PFAS use.

These exemptions will lead to hundreds of thousands of tonnes of PFAS still ending up in the environment, even under a “restriction” that's supposed to stop it.

5. Where are the incentives for innovation?

The restriction proposal lacks focus on innovation and competitiveness. This PFAS ban should act as a stimulus to innovation, not hinder it.

Over the past five years, we've seen a surge of innovation aimed at replacing PFAS, resulting in many viable alternatives already on the market and others well on their way. These solutions have the potential to put Europe at the forefront of global competitiveness.

Against this backdrop, it is both surprising and counterproductive for policymakers to undermine these green innovators. If the EU truly wants to prosper, it must clear the path for frontrunners — not place new barriers in their way.

Credit where credit is due

With all this said, the effort by the Member States to collect and analyse crucial data on PFAS production and use is greatly appreciated. This work has shed light on information that would otherwise remain hidden from the public and it demonstrates a strong commitment to transparency.

ChemSec shares the conviction that a universal PFAS restriction is the only effective method for controlling these dangerous substances. PFAS are forever. The priority should be to turn off the tap.

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