**Foam Update**

**Introduction:**

* Historically, Firefighting Foams have contained chemicals from the PFAS (Per- and polyfluoroalkylated substances) group of chemicals. PFAS chemicals are stable under intense heat and have surfactant properties and functions, for example as water and grease repellents, making them ideal constituents for Firefighting Foams. Two PFAS chemicals, perfluoro-octane sulfonic acid and its derivatives (PFOS), and perfluoro-octanoic acid (PFOA), its salts and PFOA-related compounds, were commonly used in the production of C8 Firefighting Foams.
* Both perfluoro-octane sulfonic acid and its derivatives (PFOS), and perfluorooctanoic acid (PFOA), its salts and PFOA-related compounds, are listed in the Stockholm Convention, are classified as Persistent Organic Pollutants (POPs) and therefore subject to restriction in use, conditions, and bans.
* PFOS containing Firefighting Foams were restricted under the Stockholm Convention in May 2009, and therefore its use is already banned. The RFFS should have ceased using such foam and disposed of any stockpiles by June 2011.

**What is affected?**

* Guidance documents issued by the Environment Agency (EA) and Scottish Environment protection Agency (SEPA) refer to restrictions being placed on C8 foam concentrates.
* However, C6 concentrates containing PFOA are to be added to the international list of POPs and therefore, aerodromes need to have a plan to replace such concentrates by July 2025 when their use will be prohibited.
* As from **1 January 2023**, the use of C8 PFOA containing fire-fighting foam shall only be allowed on sites where all releases can be contained.
* As from **4 July 2025**, all uses of PFOA containing foam (C8 and C6) will be prohibited.

**What do Aerodromes Need to Do?**

* Check foam stocks to see if they contain the POP pollutant Perfluorooctanoic acid (PFOA), its salts and/or PFOA-related compounds, you can.
* Check the safety data sheet for the foam.
* Contact the supplier or manufacturer of the foam.
* Have the foam analysed by a suitable laboratory to check for the presence of PFOA. (PFOA, its salts and PFOA related compounds have previously been used as active ingredients in firefighting foams, particularly in aqueous film forming foams, due to their surfactant properties. They may also be present in foams, with other active ingredients, as a contaminant.)

**Exemption**

* The law does not allow the use of substances, mixtures and articles containing PFOA, its salts and PFOA related compounds. However, there is an exemption for the storage and use of fire-fighting foam for Class B fires already installed in systems, including both mobile and fixed systems provided that the following conditions are met:
  + Holders of foam stockpiles, including that stored on firefighting vehicles, greater than 50kg must notify the relevant environment agency by completing a stockpile notification form (link in Further Guidance below) and sending to the relevant environment agency. (See Further Guidance below).
  + Notify the relevant environment agency as soon as possible if a POPs stockpile is held.
  + The fire-fighting foam is not used for training.
  + The fire-fighting foam is not used for testing unless all releases are contained.
* NB: Foam stored on firefighting appliances constitutes “an intention to use” and must therefore be contained when discharged.

**Dispose of foam containing POPs appropriately**

* It is important that waste foam is managed appropriately. Unwanted PFOA fire-fighting foams must not be discharged to a sewer. If this occurs, an offence may have been committed. (These chemicals may pass through the sewage works and contaminate the environment and drinking water. They may also contaminate sewage sludge used on agricultural land used to produce food.)
* Aerodromes should ensure that waste is taken to a hazardous waste incinerator to destroy PFOA compounds.
* Aerodromes must ensure that
  + any contractor who removes the waste is registered as a waste carrier,
  + the waste transfer or consignment note clearly indicates the presence of the PFOA chemical present.

**Further Guidance**

* England: [chemicalrestrictions@environment-agency.gov.uk](mailto:chemicalrestrictions@environment-agency.gov.uk)
* Scotland: [nationalwaste@sepa.org.uk](mailto:nationalwaste@sepa.org.uk)
* Wales: [chemicals@naturalresourceswales.gov.uk](mailto:chemicals@naturalresourceswales.gov.uk)
* Northern Ireland: [NIEAChemicals@daera-ni.gov.uk](mailto:NIEAChemicals@daera-ni.gov.uk)
* POPs stockpile notification form: [www.gov.uk/government/publications/persistent-organic-pollutants-notifying-pops-stockpile](http://www.gov.uk/government/publications/persistent-organic-pollutants-notifying-pops-stockpile)

Existing foam on vehicles constitutes “an intention to use” and must therefore be contained when discharged. Aerodromes must inform SEPA of stockpiles of concentrate and the potential for “an intention to use”.

EDF Energy and AGS airports are in the process of transferring to F3 concentrates.

Comments on the Guidance (attached) must be submitted to SEPA by close of business on December 9th.