



**OILTECHNICS**  
FIRE FIGHTING  
PRODUCTS



# A straightforward guide to the new EU & IMO firefighting foam regulations for the offshore and marine sectors and SEVESO III/COMAH sites

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[foamtesting.com](http://foamtesting.com)  
[firefightingfoam.com](http://firefightingfoam.com)

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## Q1

### Can I still use C6 AFFF firefighting foam?

The short answer is **yes**. UK and EU regulations allow the continued use of C6 foams provided they:

- meet the current REACH and UK POPs regulations for unintentional trace contaminants (UTC) for PFOA, PFOS and PFHxS, and
- are within the sector specific transition periods set out by UK and EU regulations (see Q3 below).

Substance	EU limits*	UK limits*
PFOA, its salts	1ppm	25ppb
PFOA related substances	10ppm	1000ppb
PFOS, its salts	25ppb	10ppm
PFOS related substances	1000ppb	
PFHxS, its salts	25ppb	100ppb
PFHxS related substances	1000ppb	

\*ppm = parts per million; ppb = parts per billion

**Oil Technics' C6 foams have been tested and shown to comply with these regulations and fall well within the limits.**

## Q2

### Can I still use C8 AFFF?

**No:** legacy C8 foams are prohibited under the Stockholm Convention and ceased manufacture back in 2015. They may contain unintentional contamination or break down into substances such as PFOA and potentially PFOS, which are both POP listed.

If purchased before 2015, your foam may be prohibited C8 foam, but if purchased after that date there's very little chance that it's a C8 foam. There is, however, a possibility that your foam tanks still contain residues of C8 foam, which could contaminate your entire foam stock to above the permitted POPs levels.

If in doubt, submit a sample of your foam for PFAS TOP Assay testing: see Q9 below for more information.



## What are the EU REACH and UK HSE regulations?

EU REACH published their regulations on the 2nd October 2025, while the UK HSE completed a 6 month consultation period in February 2026 on their preferred approach to PFAS in firefighting foam - which aligns closely with the EU regulations.

In both cases, different sectors have different transition periods before they are required to move away from AFFFs to fluorine free foams (FFF). Where the risk to human life and assets is high, the transition period is considerably longer than lower risk environments. These transition periods are laid out below.

**It is only at the date stated or conclusion of the transition period that a change to fluorine free from AFFFs becomes mandatory.**

It should be noted that foam technology is advancing rapidly, so it may be advisable to wait for new generation foams to be in place before transitioning, especially given the safety, commercial and operational considerations involved.

Sector	Confirmed EU transition period end date	Draft UK transition period (likely to be 12-18 months after EIF)
Portable fire extinguishers (placing on the market/selling - except alcohol resistant foam fire extinguishers)	23 <sup>rd</sup> October 2026	6 months
Portable fire extinguishers: alcohol resistant foam (placing on the market/selling)	23 <sup>rd</sup> April 2027	N/A
Municipal Fire Brigades: <u>not</u> responding to Seveso III sites	23 <sup>rd</sup> April 2027	18 months
Training and testing (except where all releases are contained)	23 <sup>rd</sup> April 2027	18 months
Civil ships – new builds	23 <sup>rd</sup> October 2030	5 years
Civil Aviation including civilian airports	31 <sup>st</sup> December 2030	5 years
Municipal Fire Brigades: responding to Seveso III sites	23 <sup>rd</sup> October 2035	10 years
Civil ships – already in service	23 <sup>rd</sup> October 2035	5 years
Seveso III sites (e.g. refineries, chemical plants, bulk flammable liquid storage sites, etc)	23 <sup>rd</sup> October 2035	10 years
Offshore Oil & Gas installations	23 <sup>rd</sup> October 2035	10 years
Military vessels	23 <sup>rd</sup> October 2035	10 years
All other sectors	N/A	5 years



q4

## My sector has a long transition period: should I transition to a fluorine free foam now?

**The short answer is no.** Longer transition periods have been put in place because the current generation of fluorine free foams mostly have significant performance deficits compared to C6 foams.

The transition periods have been agreed to allow firefighting foam manufacturers time to develop new foams which offer the same level of effectiveness when it comes to extinguishing fires.

It should also be noted that the transition periods will be reviewed closer to their end date and may well be extended further if the quality of fluorine free foams has not improved sufficiently.

A straight substitution from C6 foam to fluorine free foam is not feasible. Beyond the typically reduced extinguishing performance — especially when used with seawater, non-aspirated delivery, or used in low temperature environments such as offshore platforms and marine settings — moving to fluorine free foam also introduces several commercial and operational challenges. These often include:

- **Higher overall costs**, both initial and ongoing.
- **Increased storage requirements** due to higher foam concentrate usage.
- **Potential operational downtime** resulting from necessary equipment changes.
- **Proportioning challenges** with existing systems.
- **Complexity and added cost of system clean out** to remove potential residue from previous products prior to changeover.
- **Possible need to replace discharge devices** which may be incompatible with fluorine free foams.
- **Compatibility issues** as, unlike most AFFFs, FFFs are generally incompatible with each other.
- **Application specific concerns** that may affect performance or compliance.



q5

## Are there sectors where fluorine free foams are the preferred option?

**There are some sectors where fluorine free foams are preferred and perfectly adequate in practice, as shown by the shorter transition periods given.**

For example, fluorine free foams are suitable for most fire extinguishers and fire fighter training exercises, where the fire risk to be contained tends to be small and manageable.

If your sector has a transition period of greater than three years, it may be better to hold off until the regulations enforces you to do so and the technology behind fluorine free foams has developed further.



Q6

## What about offshore installations and shipping?

Currently, we are not aware of any fluorine free foam which performs adequately with forceful application, using seawater, in high winds and at low temperatures of  $-18^{\circ}\text{C}$ .

Some international standards specify testing with potable water, so it is important to check performance in the operational conditions and fuels in place, as using fluorine free foam may compromise safety. Some territories never experience such low temperatures and so this is not a concern - but fluorine free foams may still not perform adequately due to viscosity issues when used with forceful applications and seawater.

Oil Technics' C6 AFFF-LF foams are formulated and well proven for use in extreme offshore conditions. They function effectively at  $-18^{\circ}\text{C}$ , in high winds and with seawater. We also offer IMO approved foams for shipping.

Q7

## What about SEVESO III and COMAH sites?

Given the complexities involved in any SEVESO III or COMAH site, **a 10-year transition period has been confirmed within the EU** (ending 23rd October 2035) with a similar **10-year transition period being proposed in the UK**.

Individual risk and commercial assessments would be needed before any transition to a fluorine free foam, as the changeover is likely to involve additional foam storage and changes to the delivery system to allow for potentially slower extinguishment times, higher concentrations, viscosity issues and the necessity for gentle application.

With these issues to consider, it may be wiser to wait until nearer the end of the transition period before considering transitioning to an FFF.



Q8

## What about IMO regulations?

In regards to commercial vessels, IMO MSC 532(107) resolution clause 11.2.2 states that the **“use or storage of extinguishing media containing PFOS shall be prohibited”** - this includes the prohibition of legacy C8 foams.

The IMO has since made a clarification that an **allowable detection limit of  $< 10$  ppm of PFOS**, meaning high purity C6 AFFFs with PFOS levels below this limit can still be used on shipboard firefighting systems.

This resolution applies to new vessels from 1st January 2026. For existing vessels, C8 foams need to be replaced at their next survey.



Q9

## How can I ensure I am compliant and that my foam has not been unintentionally contaminated by C8 residues?

It's advisable to have a sample of your foam tested for PFAS content. Our independent Foam Testing Service can facilitate this.

If your sample contains PFAS / C8 foam residues, we can suggest a tank cleaning protocol. This requires that you:

- dispose of the contaminated foam according to local regulations
- clean the tank with a specialised PFAS remover
- rinse thoroughly twice with hot water
- replace the foam with a compliant C6 AFFF foam or fluorine free foam as appropriate.

Using this protocol, we carried out a representative small scale tank cleaning exercise using Oil Technics' micro-emulsion, aqueous cleaner PFAS Tank Cleaner. After cleaning, the tank was filled with a fluorine free foam and a sample sent for TOP Assay testing. The results showed that, after one treatment with PFAS Tank Cleaner followed by two hot water flushes, total PFAS had been reduced to well below the allowable UTC level of <50 ppm.

Find out more about PFAS testing at [foamtesting.com](https://foamtesting.com).



# How can we help?

There are several products and services available from OTL Group companies that can help you navigate the regulatory landscape to ensure that your foam meets the appropriate international regulations.



## PFAS TOP Assay testing for C8 residues

Our ISO 17025 certified foam test laboratory can facilitate testing your foam for C8 residues.

Foam concentrates and discharge water from cleaning foam systems should be tested to ensure PFAS levels comply with local POPs regulations using TOP Assay testing.

You can arrange testing via our [foamtesting.com](https://foamtesting.com) website where you will find a detailed guide to preparing your samples for shipment.



## Tank Cleaning protocol to remove C8 residues

Should testing show that your foam does contain C8 residues, or your foam storage tank and associated pipework would benefit from cleaning, we recommend PFAS Tank Cleaner from our sister company [Oiltechnics.com](https://oiltechnics.com).

They can also provide information on a suggested cleaning protocol which involves safely removing and disposing of the existing foam according to local environmental regulations, using PFAS Tank Cleaner to clean the tank and then rinsing and flushing the pipework with warm water twice.

It became illegal to use C8 foams for firefighting on marine vessels from 1st January 2026. Legacy C8 foams are prohibited under the Stockholm Convention, ceasing manufacture in 2015, so it is advisable to have your foam tested before replacing with a new foam.

Find out more by getting in touch by email at [info@oiltechnics.com](mailto:info@oiltechnics.com) or by telephone on +44 (0) 1561 361515.



## Technical advice

Our highly qualified and experienced technical team are on hand if you have something you wish to discuss. You can email them at [technical@firefightingfoam.com](mailto:technical@firefightingfoam.com).



# Foam concentrates

We manufacture and supply a range of foams which meets the new legislation and can be used during the relevant transition periods.

You'll find a brief summary below, or you can access information on individual foams at [firefightingfoam.com](http://firefightingfoam.com).



Range	Aberdeen Foam Product	Fuels	Minimum operational temperature	Performance accreditations
C6-AFFF	1% AFFF-LF	Hydrocarbons	-18°C	<ul style="list-style-type: none"> <li>UL162</li> <li>IMO MSC.1/Circ.1312</li> <li>EN1568-3: 2018 (1+A/1+A)</li> <li>ICAO Level B</li> </ul>
	3% AFFF-LF	Hydrocarbons	-18°C	<ul style="list-style-type: none"> <li>IMO MSC.1/Circ.1312</li> <li>ICAO Level B</li> <li>EN1568-3: 2018 (1+A/1+A)</li> </ul>
	1% AFFF	Hydrocarbons	0°C	<ul style="list-style-type: none"> <li>UL162</li> <li>IMO MSC.1/Circ.1312</li> <li>EN1568-3: 2018 (1+A/1+A)</li> <li>ICAO Level B</li> </ul>
	3% AFFF	Hydrocarbons	2°C	<ul style="list-style-type: none"> <li>EN1568-3: 2018 (1A/1A)</li> <li>ICAO Level B</li> </ul>
	1x1% AR-AFFF	Hydrocarbons & Polar Solvents	-8°C	<ul style="list-style-type: none"> <li>IMO MSC.1/Circ.1312</li> <li>EN1568-3: 2008 (1B/1B)</li> <li>EN1568-4: 2008 (1B/1B - IsoPropyl Alcohol)</li> <li>EN1568-4: 2008 (1C/1C - Acetone)</li> </ul>
	1x3% AR-AFFF	Hydrocarbons & Polar Solvents	-7°C	<ul style="list-style-type: none"> <li>EN1568-3: 2008 (1B/1B)</li> <li>EN1568-4: 2008 (1B/1B - IsoPropyl Alcohol)</li> <li>EN1568-4: 2008 (1B/1C - Acetone)</li> </ul>
	3x3% AR-AFFF	Hydrocarbons & Polar Solvents	-5°C	<ul style="list-style-type: none"> <li>EN1568-3: 2018 (1A - Fresh water)</li> <li>EN1568-4: 2018 (1A - Fresh water)</li> </ul>
F3	1% F3	Hydrocarbons	-13°C	<ul style="list-style-type: none"> <li>EN1568-3: 2018 (1B/3C)</li> <li>EN1568-3: 2018 (1+A/1+A - Diesel)</li> <li>EN1568-1: 2018 (Fresh water)</li> <li>EN1568-2: 2018 (Fresh water)</li> </ul>
	3% F3	Hydrocarbons	0°C	<ul style="list-style-type: none"> <li>EN1568-3: 2018 (1B - Fresh water)</li> </ul>
Training & Induction	1% TF	Training Foam - not for use in firefighting		
	3% TF	Training Foam - not for use in firefighting		

## PFAS Tank Cleaner

Micro-emulsion Cleaner for PFAS residue cleaning in foam tanks & equipment



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