PFAS Compliance 2026:

REACH, Product Rules, Reporting and Global Market Access

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Valerie Hemelaers

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Schrijver: Valerie Hemelaers
ISBN: 9789403895420

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Foreword to the 2026 edition

PFAS have moved from being a specialist chemical topic to one of the most important compliance challenges facing companies today.

For many years, per- and polyfluoroalkyl substances were valued mainly for what they could do. They made products more resistant to water, grease, heat, stains, chemicals and friction. They helped improve the performance of textiles, coatings, electronics, machinery, packaging, medical devices, transport equipment and many other products. In many supply chains, PFAS became almost invisible: present in coatings, components, treatments, additives, processing aids or imported articles, but rarely discussed outside technical or regulatory teams.

That period is over.

Across the European Union, the United States and other jurisdictions, PFAS are now being treated as a major environmental, health and product-compliance priority. The reason is not difficult to understand. PFAS are extremely persistent. Once released into the environment, they can remain there for decades or longer. Some PFAS are associated with serious concerns for human health and ecosystems. Even where the risks of individual substances differ, regulators increasingly agree on one central point: allowing PFAS emissions to continue unchecked is not sustainable.

This book was written for companies that need to understand what this means in practice.

It is not enough anymore to ask whether one specific PFAS is already banned. That question is too narrow. The better questions are:

Do we use PFAS anywhere in our products, materials, packaging, coatings, spare parts or imported articles?

Why are they used?

Are they intentionally added?
Are alternatives available?
Can we prove what we know?
Which markets are affected?
Could the product need a label, notification, report, derogation, reformulation or withdrawal?

These are no longer theoretical questions. France has already accelerated PFAS restrictions for cosmetics, textiles, ski waxes and waterproofing agents. The EU universal PFAS restriction is moving through the REACH process. U.S. states such as Minnesota, Connecticut, Washington, New York and New Jersey are developing their own product-focused rules, each with different triggers, categories and deadlines. At federal level, the United States is debating the scope of TSCA PFAS reporting. Other jurisdictions, including Brazil, Canada, the United Kingdom, Australia, New Zealand and Japan, are also moving toward stronger PFAS visibility and control.

The result is a fragmented but unmistakable global trend: PFAS compliance is becoming product-specific, data-driven and evidence-based.

For companies, the greatest risk is not only the law itself. The greater risk is uncertainty. Many businesses still do not know where PFAS are present in their supply chains. Supplier declarations are often vague. Product data systems are incomplete. Chemical information may be buried in technical specifications, legacy formulations or third-party components. Importers may assume suppliers have the answers. Suppliers may assume customers are not asking the right questions. Retailers may assume brands have already checked. Regulators will not accept these assumptions forever.

This book therefore takes a practical approach. It explains the major regulatory developments, but it does not stop at legal theory. It looks at what the rules mean for real products, real supply chains and real business decisions. It covers the

EU universal PFAS restriction, ECHA's sector reviews, French national acceleration, U.S. federal and state developments, emerging global regimes, and the internal governance needed to build a serious PFAS compliance program.

The message throughout the book is simple: waiting is not a strategy.

The final legal details will continue to evolve. Some deadlines may shift. Some exemptions may narrow or expand. Some reporting rules may be simplified. Some product categories may be added later. But the direction of travel is clear. Regulators are asking for more information, more transparency, more substitution and more control over PFAS emissions.

The companies that will handle this best are not necessarily the largest companies. They are the companies that start early, ask better supplier questions, map their products properly, document their decisions and build PFAS compliance into product design, procurement, quality, legal and regulatory processes.

The weakest position is to say: "Our supplier told us it is compliant."

The strongest position is to say: "We know where PFAS may be present, we know why they are used, we have evidence, and we have a plan."

That is the purpose of this book: to help companies move from uncertainty to control.

PFAS regulation will not become simpler in the short term. But with the right structure, it can become manageable.

1 Part I — PFAS fundamentals for compliance professionals

Chapter 1. What PFAS are and why regulators treat them differently

PFAS are often described in simple terms as “forever chemicals,” but that label, while useful in public communication, is too blunt for compliance work. In regulatory practice, PFAS are not one substance, one hazard profile, or one legal problem. They are a large and highly diverse group of fluorinated substances whose commercial usefulness comes from the unusual strength of the carbon-fluorine bond and the resulting performance properties: resistance to heat, water, oil, grease, staining, and chemical degradation. These same properties are also the reason regulators have become increasingly concerned. Many PFAS are exceptionally persistent, some are mobile in water, some accumulate in living organisms, and several are associated with serious risks to human health and the environment. The problem is not only that some PFAS are hazardous. It is that many are difficult to remove, difficult to monitor, and capable of creating long-term contamination that outlasts the product applications for which they were originally chosen.

That combination of usefulness and persistence is what makes PFAS different from many other regulated chemicals. Most compliance systems were built around identifying individual substances, assessing their risks, and managing them one by one. PFAS resists that logic. The class is large, chemically varied, and continuously evolving. Regulators have increasingly concluded that

dealing with PFAS substance by substance is too slow, too reactive, and too easy to evade through substitution with closely related fluorinated alternatives. That is why modern PFAS regulation is moving away from a narrow focus on a few legacy substances such as PFOA and PFOS and toward broader class-based approaches.

Definition issues

Any serious discussion of PFAS must begin with a simple but uncomfortable truth: there is no single universal definition that works identically across all laws, agencies, and compliance systems. That matters because a company can believe it has "checked for PFAS" while actually checking against only one regulatory definition, one test list, or one supplier interpretation. In practice, the question is never just "does this product contain PFAS?" The real question is "which substances count as PFAS for the purpose that matters here?"

The broad structural definition that has become especially influential comes from the OECD. In its 2021 terminology guidance, the OECD defined PFAS as fluorinated substances that contain at least one fully fluorinated methyl or methylene carbon atom, with a few noted exceptions. That definition is intentionally broad. It was developed to bring greater consistency to scientific and regulatory discussions and to reflect the fact that the PFAS universe is much larger than the relatively small group of well-known substances that dominate public debate. This broader structural framing has been highly influential in Europe and in international policy discussions because it captures both older and newer fluorinated chemistries that may otherwise escape attention if regulators or companies rely only on named substance lists.

ECHA has broadly followed that structural approach in its PFAS work and in the EU restriction context. In materials linked to the universal PFAS restriction process, ECHA has indicated that the substances in scope are those meeting the OECD definition. That is a critical compliance point. It means that businesses cannot assume that only the best-known PFAS are relevant. If a substance falls within the structural definition, it may become relevant even if it has never been the subject of major media attention, specific testing routines, or historical compliance questionnaires.

At the same time, the United States illustrates how definition problems become operational problems. EPA itself explains PFAS as a group of manufactured chemicals that have been used since the 1940s and explicitly notes that there are thousands of different PFAS. But EPA programs do not always use identical PFAS lists or triggers for every purpose. Different statutes and reporting programs may use different scope rules, named lists, or definitions. EPA also acknowledges that definitions of which chemicals are considered PFAS can vary. That is not just a technical nuance. It means a product may be in scope for one reporting system, outside a different inventory, and still commercially exposed because a customer, state law, or retailer uses a broader interpretation.

This definitional instability creates three common business mistakes.

The first is overconfidence. A company receives a declaration saying “no PFAS present” and assumes the matter is closed, without asking which definition the supplier used. The second is under-screening. A company tests only for a short list of legacy substances and assumes a negative result means the product is PFAS-free. The third is false comparability. A business assumes that if a product

is compliant under one jurisdiction's PFAS framework, it is functionally safe everywhere else. In 2026, that assumption is often wrong.

That is why PFAS compliance begins not with testing, and not even with legal analysis, but with definitional discipline. Before asking whether a product contains PFAS, a company must first decide which definition governs the question, who is applying that definition, and whether the available data truly answers it.

Polymer vs non-polymer questions

One of the most confusing areas in PFAS compliance is the distinction between polymer and non-polymer PFAS. Many non-specialists assume that polymers are automatically safer, less relevant, or exempt from serious regulatory concern. That assumption is dangerous.

Some PFAS are non-polymeric substances, such as certain perfluorocarboxylic acids or sulfonates, which have often been the first substances to attract regulatory attention because they are more easily identified, more studied, and more directly associated with environmental and health effects. Other PFAS are polymeric, including fluoropolymers, perfluoropolyethers, and side-chain fluorinated polymers. These materials are widely used in high-performance applications because they provide durability, chemical resistance, non-stick properties, water repellence, or friction reduction. Their commercial importance is one reason the polymer issue has become so contentious.

The mistake is to treat "polymer" as meaning "not a PFAS problem." OECD work on side-chain fluorinated polymers makes clear that certain polymers contain substructures

meeting the OECD PFAS definition. In other words, some polymers are very much part of the PFAS universe. More importantly, regulators increasingly look not only at the polymer as sold, but at the full life cycle of the material: production emissions, residual monomers, processing aids, degradation products, side-chain cleavage, waste-phase releases, and the long-term fate of transformation products. A polymer that appears stable in one context may still contribute to PFAS contamination elsewhere in its life cycle.

This matters enormously for compliance strategy. Traditional polymer exemptions under some chemical laws created a habit of treating polymers as lower-priority from a registration perspective. But PFAS policy is not being driven only by classic registration logic. It is increasingly driven by persistence, emissions, and the inability of existing waste and remediation systems to manage long-term fluorinated contamination. That means a company cannot assume that because a material is a polymer, regulators will ignore it, customers will accept it, or future restrictions will spare it. The question is no longer just whether the polymer itself is immediately bioavailable or acutely toxic. The question is whether its production, use, disposal, or degradation contributes to the wider PFAS problem.

There is also an important distinction within polymeric PFAS categories. Side-chain fluorinated polymers often attract particular concern because they can contain fluorinated side chains that may degrade into smaller PFAS of concern over time. Fluoropolymers are sometimes defended as lower-risk in use because of their stability and lower bioavailability, but regulators have increasingly examined the broader life-cycle burdens associated with their manufacture and disposal. Perfluoropolyethers raise

their own technical and analytical issues. The key compliance point is simple: “polymeric” does not mean “irrelevant.” It means the analysis gets more complex.

For companies, the practical implication is clear. Supplier questionnaires must not stop at asking whether a product contains PFOA or PFOS. They must also ask whether fluoropolymers, side-chain fluorinated polymers, PFPEs, fluorinated processing aids, or other structurally relevant PFAS are present. If the question is too narrow, the answer may be technically true and commercially useless.

Why “PFAS as a class” changes compliance strategy

The decision to regulate PFAS as a class, or at least to move in that direction, changes compliance strategy more than many companies realize. Under a substance-by-substance model, companies can wait for a particular chemical to be listed, restricted, or banned. They can focus on named substances, update their databases one entry at a time, and respond after the legal signal is explicit. That model does not work well for PFAS.

Class-based thinking changes the timeline. Instead of asking whether a specific PFAS has already been targeted, companies must ask whether an application category, fluorinated functionality, or product design choice is likely to become exposed because it belongs to the broader PFAS universe. This is a more strategic and much less comfortable way of managing compliance. It requires earlier screening, deeper supply chain visibility, broader material declarations, and more realistic substitution planning.

Why are regulators moving this way? Because they increasingly see regrettable substitution as a structural

failure of the old model. When one PFAS is restricted and replaced by a chemically related fluorinated alternative with similar persistence concerns, the practical result may be delay rather than risk reduction. A class-based approach tries to prevent that cycle by focusing on shared properties and shared regulatory concerns rather than waiting for full toxicological certainty for every individual substance. This logic is visible in OECD terminology work, in ECHA's restriction framing, and in the broader policy direction of PFAS management internationally.

For compliance professionals, this changes four things.

First, screening must become broader. It is no longer enough to ask whether a product contains a handful of listed PFAS. The screening process must be built around structural classes, functions, and high-risk applications such as stain resistance, non-stick performance, grease proofing, surfactancy, high-performance sealing, and extreme chemical resistance.

Second, supplier engagement must become more sophisticated. Generic declarations are not enough if they do not state the definition used, the scope of the inquiry, and whether the answer covers polymers, processing aids, impurities, and degradation-relevant materials. A supplier that says "no restricted PFAS" is not answering the same question as one that says "no substances meeting the OECD PFAS definition."

Third, testing strategy must become more cautious. Analytical testing can help, but it does not solve the whole PFAS problem. Targeted testing only identifies the substances being specifically looked for. Total fluorine or total organic fluorine screening can indicate the presence of fluorinated material, but it does not by itself identify which