

Insights

PFAS PLAN 2026 – PILLARS TO CURATE CHANGE

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SUMMARY

The UK Government published the [PFAS Plan](#) on the 3 February 2026, as promised in the [Environmental Improvement Plan 2025](#). The Plan sets out a framework for understanding PFAS's effects on the environment, implementing targeted restrictions, and developing regulatory guidance which we explore in more detail in this Insight.

INTRODUCTION TO THE PLAN

The Government has structured the Plan around three strategic pillars that prioritise understanding, intervention and protection. It further highlights that increased information is required to take account of the full life cycle of PFAS: from manufacture, to use and the management of PFAS waste. The Government has outlined that moving away from PFAS and putting new regulations in place will take time.

UNDERSTANDING PFAS

The first pillar focuses on understanding PFAS sources and impacts, highlighting the need to expand knowledge in relation to the prevalence and impact of PFAS in the environment currently, the effect on wildlife, on biodiversity and on humans. Humans are exposed to PFAS through diet, drinking water, indoor dust, and skin contact. Despite the aforementioned prevalence of PFAS, whilst some PFAS have been well studied and regulated, the effects of others remain uncertain and unproven.

The Plan introduces a Government commitment to continue annual monitoring of 2,400 freshwater samples in England, whilst Scotland will expand its monitoring from approximately 300 to 500 samples by 2026. By the end of 2026, a PFAS mapping tool will also be made available to all public sector bodies across England, with an interactive public website to follow in 2027. The Government have added the commitment to consider adding further PFAS to the UK Pollutant Release and Transfer Register and to undertake further research on areas of emerging concern.

TACKLING PFAS PATHWAYS

The second pillar of the PFAS Plan addresses PFAS pathways through the environment, recognising that these substances may persist indefinitely once released. The Government acknowledges the need for caution, recognising that some PFAS applications currently lack viable alternatives, creating difficult trade-offs between environmental protection and functionality. The Government aims to drive industry transition away from PFAS through enhanced monitoring, regulatory pressure, and improved public awareness. To do this the Government has proposed developing relevant cross-sector guidance across regulators and operators of facilities and installations subject to environmental permits, to reduce emissions of PFAS and improve handling, monitoring and disposal and to use this guidance to develop appropriate measures for PFAS control. Alongside this the Government is aspiring to develop scientifically robust and defensible environmental thresholds and to work with industry and regulators to identify and encourage use of Best Available Techniques (BAT).

Work on the UK's Registration, Evaluation, Authorisation and Restriction of Chemicals (UK REACH) restriction for PFAS in firefighting foams is progressing, with the Health and Safety Executive's final opinion is expected in 2026 and a Government decision on implementation expected in 2027. Internationally, the UK is implementing obligations under the Stockholm Convention on Persistent Organic Pollutants, engaging with the Montreal Protocol on ozone-depleting substances, and participating in the new Intergovernmental Science-Policy Panel on Chemicals, Waste and Pollution. There are no current plans for any specific restrictions on the use of PFAS, setting the UK apart from the EU, who are currently preparing to impose a wide ban on the use of PFAS. However, the Government has said it will consider adding more PFAS to the UK REACH candidate list of Substances of Very High Concern, a designation that triggers enhanced regulatory scrutiny, and will look to align UK REACH with its EU counterpart by December 2028, suggesting that wider bans may eventually be put in place.

REDUCTION OF ONGOING EXPOSURE

The third pillar focuses on reducing ongoing PFAS exposure through assessing potential risks to human health, managing the risks in food, continued improvement of drinking water and freshwater as well as addressing legacy PFAS pollution and managing the risks of PFAS in consumer products. Current guidance (produced by the Drinking Water Inspectorate) requires public water companies to monitor and report on the sum of 48 named PFAS, with concentrations of 0.1 micrograms per litre and above reported as water quality events requiring all necessary actions to reduce concentrations. The plan notes that there is currently no evidence of PFAS above the permitted level of 0.1 micrograms per litre in drinking water supplies, supporting the effectiveness of industry mitigation strategies.

Work will be carried out on testing PFAS in food contact materials, strengthening analytical capability using international standards and prioritising high-risk materials where PFAS use is

prevalent. Approximately 94% of sludge from water companies is recycled to land, though it is used on only around 1.9% of farms in Great Britain. A consultation on how sewage sludge use in agriculture is regulated will consider whether this should be included in the Environmental Permitting Regime. A clear and transparent framework will be set out for prioritisation of risks and potential actions at sites based on the national risk screening programme, with the Environment Agency supporting relevant authorities in assessing and understanding PFAS-related risks.

CONCLUDING REMARKS

The strategy's fundamental character is gradualist rather than revolutionary. The stated vision explicitly acknowledges that transitioning away from PFAS will require time, as will implementing new regulations, with trade-offs requiring careful consideration. The Plan deserves credit for its systematic, evidence-based methodology and collaborative ethos. The commitment to partnership working across Government, industry, environmental groups, and the public offers genuine opportunities for collective problem-solving.

KEY TAKEAWAYS

It is evident that key developments will continue to unfold as focus on PFAS continues to grow. The key points to be aware of from the Government's Plans are:

- Despite the proposed ban on the use of PFAS in firefighting foam, there are no further specific bans or restrictions the Government is presently proposing.
- The Government will reform UK REACH to enable faster implementation of chemical protections, aligned more closely with trading partners (especially the EU) by December 2028. This suggests the UK will broadly track EU restrictions on PFAS in manufacturing rather than diverging significantly post-Brexit.
- The Government proposes to progress towards the addition of more PFAS to the candidate list for Substances of Very High Concern

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