Workplace Safety ACADEMY



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The Future of PFAS Regulations Starts Today

With new reporting requirements expected this fall, it's time for companies to prepare, monitor and mitigate use of forever chemicals across their supply chains.

by Emma Holmberg

Regulation of per- and polyfluoroalkyl substances (PFAS) is moving fast. Businesses that delay taking steps to maintain compliance risk multi-million-dollar fines, costly product reformulations, and lost contracts as customers and regulators demand safer alternatives.

At the turn of the century, regulators initially focused on a few well-known compounds because they were the most prevalent, well-studied, and clearly associated with environmental and health risks. Now, regulators are shifting toward rules that address PFAS as a whole class because many other PFAS share similar persistence, bioaccumulation and toxicity concerns. This creates broad compliance obligations for manufacturers, importers and downstream users.

Deadlines are approaching fast, too. The U.S. Environmental Protection Agency's Toxic Substances Control Act (TSCA) reporting requirements will take effect in October 2026, meaning companies have only one year to disclose PFAS use, volume and hazards. Several states have already enacted bans or reporting mandates across consumer and industrial products. And high-profile settlements, including the $875 million settlement the New Jersey Department of Environmental Protection reached with Chemours, DuPont and Corveta in August 2025, illustrate how high the stakes are.

The message is clear: Companies must act now to understand exposures, update reporting and risk management practices, and plan for reformulations where necessary—before the EPA starts enforcement. Failure to do so risks litigation or customer pressure, escalating costs far beyond proactive measures.

What PFAS are, and Why Everyone is Talking About Them

PFAS are a large group of synthetic chemicals used in a wide range of consumer and industrial products because of their resistance to heat, water and grease. PFAS enter the environment and human body in multiple ways:

- leeaching into drinking water from manufacturing or disposal sites,
- migrating from food packaging, or
- being released as household dust from treated fabrics and carpeting.

Because these chemicals contain extremely strong carbon-fluorine bonds—the strongest in organic chemistry—they don't break down easily. Over time, they accumulate in the environment, wildlife and human

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bodies, earning their nickname "forever chemicals."

Studies have associated PFAS with serious health risks, including liver damage, hormone disruption, immune system problems and even certain cancers.

For years, regulation focused mainly on PFOA (perfluorooctanoic acid) and PFOS (perfluorooctane sulfonic acid), which had the most evidence and public attention. Today, the scope is expanding rapidly as regulators begin to include lesser studied compounds and shorter-chain PFAS to better protect public health and the environment.

From Regulating Individual Chemicals to Entire Classes

The EPA's April 2024 National Primary Drinking Water Regulation sets enforceable limits for six PFAS and introduced a hazard index to capture the combined effects of multiple compounds. The rule gave public water systems until 2029 to comply with the Maximum Contaminant Levels (MCLs) for PFOA and PFOS.

As of May 14, 2025, the EPA has announced it will keep the current MCLs for PFOA and PFOS in place. The limit remains 4.0 parts per trillion for each chemical. However, the agency will rescind and reconsider the regulatory determinations for the other four PFAS covered by the April 2024 rule:

- perfluorohexanesulfonic acid (PFHxS);
- perfluorononanoic acid (PFNA);
- hexafluoropropylene oxide dimer acid (HFPO-DA), also known by its trademark name of GenX; and
- the hazard index mixture that includes perfluorobutanesulfonic acid (PFBS).

States including California, Maine, Michigan and Minnesota have gone further, enacting class-based bans on intentionally added PFAS in everyday products, such as cookware, cosmetics, textiles and food packaging. While these bans currently target PFAS that manufacturers deliberately add, regulators are already examining how to address trace or unintentional PFAS and may tighten exemptions over time. Minnesota's "Amara's Law," for example, phases in prohibitions through 2032, and Maine has similar long-term deadlines tied to its "currently unavoidable use" reviews. These moves signal that companies must prepare for deeper supply chain transparency and stricter global requirements even as U.S. federal policy has shifted under the new Trump administration.

What This Means for Businesses

Even though compliance deadlines for PFOA and PFOS have been extended and regulations for expanded compounds are being reconsidered, the overall trend is toward more comprehensive regulation.

In this environment, comprehensive chemical visibility and traceability will be essential for businesses. Many PFAS substances are used in manufacturing processes, either in trace amounts or as part of upstream components. This means PFAS can go undetected without robust chemical management systems in place. Future regulations are also expected to reach beyond finished goods to parts suppliers and other upstream vendors, making end-to-end supply chain transparency critical.

Businesses that invest early in chemical monitoring, data collection, and supplier oversight will be better positioned to meet current and future regulations, maintain customer trust, and gain a competitive advantage in a market increasingly focused on PFAS-free products.

What Companies Can Do Now

The most common challenge companies face now is visibility. Many companies don't know which PFAS chemicals they're using—if any—or whether those substances are about to be regulated.

Therefore, acting early is essential. A proactive approach strengthens resilience and supports long-term sustainability goals. Conversely, delaying planning and preparation can result in operational disruptions, noncompliance, reputational damage and even legal exposure.

Here are four actions companies can take today:

- **Build a comprehensive chemical inventory.** Effective chemical management starts with data. Businesses must maintain a complete inventory of substances used, produced or stored across their operations. This includes Safety Data Sheets (SDS), hazard classifications, risk assessments and supplier disclosures. Today, digital chemical management solutions allow organizations to screen materials against global PFAS

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classifications and receive real-time updates on new regulatory developments. These systems help identify substances that may otherwise be missed due to varying naming conventions or incomplete documentation.

- **Evaluate safer substitutes and plan for phase-out.** According to our recent study, almost 40% of North American workers today don't believe their employer is actively phasing out hazardous chemicals in the workplace. Businesses that do embrace substitution will win not just in the regulatory race but also in engaging employees and making them feel safer. Companies should begin side-by-side comparisons of current substances used against available alternatives, making chemical substitution a proactive strategy rather than a last-minute response. Even if replacements aren't perfect today, early evaluation helps avoid costly reformulations later and supports long-term sustainability goals. Leveraging digital tools can help screen chemicals for hazards, assess alternatives and document chemical substitution decisions for regulators and customers alike.
- **Monitor the global regulatory environment.** PFAS regulation is evolving across multiple regions and sectors. A material that remains compliant in one market may soon face restrictions in another. Companies must stay informed through continuous horizon scanning, monitoring pending legislation, and engaging with guidance documents and public consultations.
- **Enhance supply chain transparency.** PFAS-related risks often originate deep in the supply chain. Companies should implement procurement policies that require disclosure beyond what is legally mandated. This includes supplier questionnaires, contract language updates and clear expectations around chemical transparency.

Due to the complexity of global supply chains, it is critical to move beyond surface-level data and establish long-term supplier collaboration. This supports both compliance and the shift toward safer alternatives.

From Regulatory Response to Risk Leadership

So far, we have focused on the United States, but other countries are moving quickly, too.

In 2023, the European Union proposed the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) regulations that would ban over 10,000 PFAS, including their use in articles, mixtures and products. Restrictions on PFHxA already apply to textiles, food-contact materials and mixtures, though transitional periods are still in place for certain uses.

In Canada, mandatory reporting is in place for hundreds of PFAS, and the government is preparing to list PFAS (excluding fluoropolymers) as toxic under its Canadian Environmental Protection Act (CEPA) laws, which would trigger stricter regulation on use, import and labelling. These global developments mean U.S. exporters should expect to meet stricter international standards, often sooner than domestic requirements take effect.

Chemical risk management now requires cross-functional collaboration, data-driven decision-making and continuous improvement. Businesses that act early and invest in visibility substitution and transparency are more likely to retain trust and reduce exposure. This proactive approach also helps them maintain market access.

The next wave of PFAS regulation is not approaching; it's already underway. Companies that lead today will avoid being forced to make reactive decisions tomorrow.

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