

## Purpose & Scope

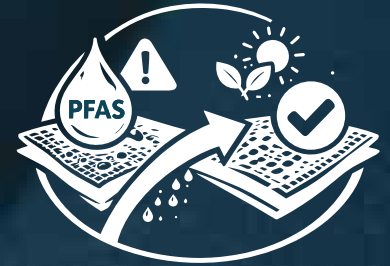
This document provides guidance for brands, manufacturers, and suppliers in the textile, footwear, and accessories industries to **gradually phase out PFAS** from their products and to support compliance with emerging national and international regulations.

## What Are PFAS and Why Are They Restricted?

PFAS (Per- and Polyfluoroalkyl Substances) are synthetic chemicals that contain at least one fully fluorinated group ( $-CF_2-$  or  $-CF_3$ ).

They are extremely persistent (“forever chemicals”) and potentially hazardous to human health, even in very small amounts.

AFIRM adopts a **broad definition of PFAS**, aligned with regulatory approaches used in California, New York, and the EU.



## Testing & Communication Protocols

### For brands:

- Inform suppliers early about planned PFAS phaseout, including a clear timeline.
- Identify materials likely to contain PFAS, such as water-repellent, stain-resistant, or quick-drying products.
- Request updated Safety Data Sheets (SDS), Technical Data Sheets (TDS), and written PFAS declarations.

Require testing protocols and verify that they comply with AFIRM standards.

### For Material Suppliers:

- Provide PFAS-free alternatives for treatments (e.g., DWR – Durable Water Repellent).
- Submit current SDS/TDS and clarify if PFAS or PTFE-based components are present.
- Use a two-tiered testing system.

**Failing either test requires corrective actions or material rejection.**

## Avoiding Misleading Product Claims

Other PFAS substances or cross-contamination may still be present.

Therefore, clear, transparent, and substantiated communication is strongly recommended. s “PFOA-free” or “PFOS-free” do not mean that a product is completely PFAS-free.

Other PFAS substances or cross-contamination may still be present.

Therefore, clear, transparent, and substantiated communication is strongly recommended.

## Testing Strategies:

**Total Fluorine Testing:** According to EN 14582:2016 or ASTM D7359:2018  
Threshold: 100 ppm (dropping to 50 ppm from 2027, e.g., in California).

**Organic Extraction & PFAS Screening:** e.g., ISO 23702-1 or EN 17681-1/2  
Sensitivity: 10–100 ppb.

## Industry Standards & Certifications:

Following tools to support PFAS-free implementation:

- **Bluesign®:** No longer lists PFAS-containing formulations.
- **GreenScreen Certified™:** PFAS are on the restricted list.
- **OEKO-TEX®:** Bans PFAS in multiple standards (STANDARD 100, LEATHER STANDARD, ECO PASSPORT).
- **ZDHC MRSL v3.0:** Includes all PFAS — the ZDHC Gateway helps find compliant chemical formulations.



## Regulatory Updates: EU & France

France has adopted a phased national PFAS restriction starting from **1st of January 2026**, with sector-specific bans, exemptions, and transition periods.

- Includes defined exceptions and transition periods, e.g.:
  - 12-month sell-through for products manufactured before 01/01/2026
  - Special provisions for products with >20% recycled content

This represents the **first legally binding national PFAS product ban within the EU**, going beyond reporting or due-diligence obligations.

## EU Outlook

The French regulation is widely seen as a **precedent**. A broader **EU-wide PFAS restriction** is expected and under active discussion. PFAS-free materials and verified supply chains are no longer a future ambition but a **near-term market and compliance requirement**.