

How Safety Pros Can Prepare for the Next Wave of PFAS Rules

Understanding the Rising Tide of PFAS Regulation and Its Impact on Industry

Per- and polyfluoroalkyl substances (PFAS) have become one of the most scrutinized classes of chemicals in modern environmental and occupational safety discussions. Known as “forever chemicals” for their extreme persistence in the environment and the human body, PFAS are used in thousands of industrial and consumer applications—from firefighting foams and waterproof coatings to electronics and food packaging.

Over the past decade, a growing body of research has linked PFAS exposure to adverse health outcomes such as thyroid disorders, immune dysfunction, liver damage, and certain cancers. As a result, regulatory bodies around the world are tightening controls on the manufacture, use, and disposal of PFAS-containing materials.

For safety professionals, the implications are significant. The next wave of PFAS regulations—expected to roll out across federal, state, and international jurisdictions—will demand rigorous chemical transparency, precise tracking, and proactive risk management. Companies that start preparing now will be in the best position to remain compliant, protect workers, and safeguard their reputations.

Why the Regulatory Landscape Is Changing: A Global Push Toward PFAS Accountability

The U.S. Environmental Protection Agency (EPA) has made PFAS regulation a top priority through its PFAS Strategic Roadmap, which outlines aggressive goals through 2030. The agency plans to set enforceable drinking water limits, require new reporting under the Toxic Substances Control Act (TSCA), and classify certain PFAS as hazardous substances under CERCLA (Superfund).

Meanwhile, state-level actions are moving even faster. States such as Maine, Minnesota, and California have proposed or enacted bans on PFAS in consumer goods, including textiles, cosmetics, and food packaging. The European Union is also considering sweeping restrictions under REACH that could eliminate most PFAS uses entirely by the early 2030s.

This increasingly complex web of regulations means that safety leaders cannot afford to take a wait-and-see approach. To navigate these evolving expectations, organizations must build internal systems capable of tracking PFAS across global operations, identifying potential risks, and responding swiftly to new compliance obligations.

Step 1: Build and Maintain an Accurate Chemical Inventory

At the foundation of any PFAS compliance strategy lies a comprehensive, accurate chemical inventory. Many companies already maintain chemical registries for OSHA's Hazard Communication Standard (HazCom) or GHS requirements, but few are equipped to capture the specific PFAS compounds and variants that may be present in formulations or raw materials.

Because PFAS can exist in trace amounts or as proprietary components within complex mixtures, companies must take a deeper analytical approach:

- Audit all materials and products used or sold by the company, including lubricants, coatings, surfactants, and polymers.
- Collaborate with suppliers to obtain complete Safety Data Sheets (SDS) and disclosure of all PFAS constituents, even those not explicitly listed on product documentation.
- Update data management systems so that PFAS-related information is searchable, trackable, and easily retrievable during regulatory audits.

A living chemical inventory not only supports PFAS compliance but also strengthens overall chemical risk management across the organization.

Step 2: Monitor Pending PFAS Legislation and Regulatory Trends

PFAS rules are not uniform, and they continue to evolve rapidly. Safety professionals should implement a systematic monitoring process to stay informed about new or proposed legislation at federal, state, and international levels.

This includes:

- Subscribing to regulatory databases or using automated tools that track chemical legislation updates globally.
- Engaging with industry associations such as the American Chemistry Council, the National Association for Environmental Management (NAEM), or the Environmental Council of the States (ECOS).
- Monitoring enforcement actions and lawsuits, as these often set precedents that inform future rulemaking or liability exposure.

Understanding these trends allows safety teams to anticipate new reporting obligations, phase-outs, and product bans avoiding costly surprises that can arise from reactive compliance.

Step 3: Strengthen Data Management Systems to Detect PFAS Across the Supply Chain

Supply chains present one of the most significant challenges for PFAS compliance. Because PFAS are used in diverse industrial processes, many organizations may not even realize they are handling PFAS-containing materials.

To close this visibility gap, companies should:

- Implement digital chemical management platforms capable of screening materials and vendor data for PFAS identifiers (such as CAS numbers or chemical family names).
- Leverage artificial intelligence and analytics tools to flag potential PFAS-containing substances based on ingredient profiles, manufacturing origins, or historical use.
- Conduct supplier surveys that specifically address PFAS usage and reporting expectations, ensuring vendors disclose full chemical compositions.

By proactively identifying PFAS sources in the supply chain, companies can make informed decisions about substituting safer alternatives, reducing risk before regulatory deadlines arrive.

Step 4: Develop a PFAS Risk Communication and Training Program

Even the most advanced compliance systems rely on informed people. Safety leaders should ensure that employees, procurement teams, and EH&S staff understand what PFAS are, where they may appear, and how to handle them responsibly.

Key actions include:

- Training teams on PFAS hazards and labeling requirements, emphasizing safe handling, disposal, and personal protective equipment (PPE).
- Communicating company policies and compliance goals clearly to all departments, from R&D to logistics.
- Establishing internal reporting mechanisms for employees to raise questions or concerns about potential PFAS-containing products or waste streams.

Creating a culture of awareness around PFAS not only supports compliance but also demonstrates a company's commitment to environmental stewardship and worker safety.

Step 5: Prepare for Testing, Reporting, and Disclosure Requirements

Upcoming PFAS regulations will increasingly require companies to test, track, and publicly disclose PFAS concentrations in products, emissions, or wastewater. To get ahead, organizations should establish testing partnerships and data protocols now.

This includes:

- Partnering with certified laboratories capable of analyzing ultra-trace levels of PFAS in environmental samples and finished products.
- Building internal databases to centralize results and link them to chemical inventories.
- Preparing disclosure documentation aligned with EPA's TSCA reporting requirements or state-specific mandates.

By starting early, companies can avoid last-minute testing bottlenecks and maintain a strong position of regulatory readiness.

Step 6: Collaborate Across Departments and With External Experts

PFAS management is inherently interdisciplinary—it touches product design, procurement, legal compliance, waste management, and sustainability. Safety professionals should spearhead cross-functional collaboration to ensure consistent understanding and coordinated action.

Additionally, engaging external experts such as environmental consultants, toxicologists, or regulatory attorneys can provide critical insights into complex compliance questions, testing methodologies, and future policy developments.

Collaboration is also key beyond company walls. By participating in industry coalitions and public-private initiatives, safety leaders can help shape regulatory frameworks that balance environmental goals with practical implementation timelines.

Turning Compliance Into Competitive Advantage

As PFAS regulation continues to evolve, proactive preparedness will separate leaders from laggards. Companies that invest now in chemical transparency, supply chain traceability, and workforce education will not only avoid compliance pitfalls but also position themselves as trusted, sustainable brands in the marketplace.

Moreover, reducing PFAS reliance can open doors to innovation in green chemistry and product design, driving long-term business resilience.

For safety professionals, the challenge ahead is clear: anticipate, adapt, and act. By building robust systems for chemical management and engaging company-wide collaboration, they can ensure compliance while contributing to a healthier environment and workforce.

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