

From Local Burden to Shared Responsibility – Why the PFAS Conversation Must Start at the Local Level

Executive summary

PFAS pollution has become a continent-wide crisis, with tens of thousands of confirmed or suspected contaminated sites across Europe. The costs for monitoring, remediation and tackling the consequences of the pollution are rising rapidly, and are compounded by growing concerns about the serious health impacts of long-term PFAS exposure, including immune system effects, hormonal disruption and increased risks of certain cancers. Local and regional authorities (LRAs) are on the front line: they must guarantee safe drinking water, manage soil and groundwater, operate waste and wastewater systems, and answer citizens' concerns — yet they have little control over PFAS sources and limited capacity to remove these persistent chemicals once released. Isolated national rules and regulatory delays exacerbate the problem, leaving LRAs to shoulder rising operational and financial burdens while pollution spreads across borders and deeper into ecosystems.

Europe urgently needs coordinated, ambitious EU-level action that prevents new PFAS pollution through the implementation of a fast and comprehensive restriction with only strictly time-bound exemptions, the modernisation of the REACH framework, and support to industry — especially SMEs — in transitioning to PFAS-free alternatives. A common European framework for detection and remediation, stronger implementation of the polluter-pays principle, an Extended Producer Responsibility scheme for orphan pollution, and substantial EU funding and capacity-building are essential to empower LRAs. By recognising local authorities as key governance partners and equipping them with resources, knowledge, and legal clarity, the EU can halt PFAS accumulation, remediate polluted environments, and protect both citizens and public budgets while reinforcing Europe's broader green transition and global leadership.

Across Europe, PFAS pollution has reached a scale that can no longer be ignored. In early 2023, the *Forever Pollution Project*¹ revealed that nearly **23,000 sites** across the continent are already contaminated with PFAS, alongside **21,500 additional sites** where contamination is presumed due to current or historical industrial activity. PFAS pollution is therefore not a series of isolated incidents but a continent-wide environmental crisis that seeps into air, soil, groundwater, rivers, and the food chain to reach the human body. The costs² associated with this contamination are staggering: even in a “legacy” scenario — where emissions stop immediately and remediation focuses solely on longer-chain PFAS such as PFOS and PFOA — the bill would reach **€95 billion over 20 years**. In the “emerging” scenario, where emissions continue and short- and ultra-short chain PFAS must also be addressed, remediation costs alone (not including indirect - health - costs) could escalate to **€2 trillion over 20 years**, and over **€100 billion annually in perpetuity** if phase-out measures are not implemented. These estimates remain conservative, as many unknown and unaccounted-for costs such as health impacts still lie outside available data. While innovation may reduce certain remediation expenses in the future, the most cost-effective path remains clear: drastically reducing PFAS emissions at source.

When PFAS contamination occurs, it is local politicians and administrations who face citizens' questions, manage emergency measures, and must provide practical solutions. Cities and regions have a legal responsibility to protect their populations and to ensure the proper functioning of essential public services. Because competencies such as **drinking water supply, wastewater treatment, stormwater and groundwater management, air quality, soil monitoring, waste collection and treatment, and land-use planning** fall within their remit, local and regional authorities bear the brunt of the operational and financial burden of PFAS contamination. They must identify and map polluted sites, monitor pollution over time, plan and execute remediation operations, communicate

¹ <https://foreverpollution.eu/>

² <https://foreverpollution.eu/lobbying/the-bill/>

with citizens, conduct health-impact studies, and increasingly support industries in transitioning away from PFAS. **Yet despite these responsibilities, Cities and regions have little to no control over the sources, the spread of PFAS, and limited technical or financial means to remove these persistent chemicals once they have infiltrated local environments.**

These financial consequences are already substantial. In Düsseldorf, PFAS-related work — ranging from groundwater investigations to remediation measures — have cost **€10.2 million** between 2007 and 2023. In the Lyon metropolitan area, **€2.1 million** have already been spent on monitoring, and the installation of a filtration unit at a local drinking-water plant to meet current standards will require a further investment of **€5 million**. These examples are emblematic of the growing financial pressure on Local and Regional Authorities (LRAs), whose budgets are already constrained and who must navigate rising expectations from citizens, tightening regulatory standards, and escalating environmental challenges.

This situation calls for urgent action at the European Union level. PFAS pollution ignores national borders, as highlighted by Dutch water companies urging Germany to impose discharge limits on PFAS to protect the Rhine³. Yet EU Member State regulations remain fragmented, creating uneven levels of protection, and undermining the capacity of authorities and businesses to plan the required long-term investments. PFAS are a global problem, and the EU must not only act cohesively within its borders but also take a leadership role internationally to drive coordinated global action.

To protect the health of our citizens and the ecosystems as well as public budgets, **more must be done to stop pollution at its source, clean up contaminated environments, and support the local and regional authorities who are disproportionately affected by PFAS contamination.**

1. Preventing pollution at source

While the EU has taken meaningful steps in recent years, the scale of the challenge requires a far more comprehensive and ambitious approach. At present, only a limited number of PFAS substances and uses are regulated, and emission thresholds remain inconsistent across environments such as surface and groundwater, soil, air, food, wastewater, and drinking water. Addressing PFAS one substance at a time is ineffective, as restricted chemicals can easily be replaced with others that are equally harmful. All sources of pollution must therefore be regulated, and land-management practices must ensure that PFAS are not further dispersed. If Europe is to tackle PFAS effectively, it must prioritise preventing new pollution and restricting these substances as broadly as possible.

a. A universal PFAS restriction: the need for a fast, comprehensive and enforceable ban

Local and regional authorities strongly support the goal of establishing the most comprehensive possible restriction of PFAS currently under assessment by ECHA. Any weakening or stepping-down of the proposal would undermine efforts to protect citizens and ecosystems. **A fast, ambitious, and complete** restriction is essential to prevent further accumulation of these persistent chemicals in our environment. Where exemptions are scientifically unavoidable, they must remain **strictly limited**, clearly **time-bound**, and designed to drive the rapid development and uptake of non-PFAS safe alternatives. Only a genuinely universal restriction can ensure that one PFAS substance is not simply replaced with another one exhibiting the same harmful characteristics.

Preventing additional PFAS accumulation is not only critical for public health and environmental integrity; it is also fundamental to the credibility of Europe's green transition. An industry that continues

³ <https://www.riwa-rijn.org/wp-content/uploads/2024/09/Press-release-annual-report-RIWA-Rijn-2023.pdf>

to rely on PFAS cannot credibly position itself as sustainable or leader in its field. By definition, PFAS use is incompatible with Europe's long-term objectives of achieving healthy soils, good air and water quality⁴.

This ambition must also be approached from a global perspective. An effective restriction should:

- **Limit the export of PFAS produced within the EU**, as continued production for export merely shifts use and end-of-use pollution abroad while leaving European communities exposed to risks from production sites.
- **Prevent the import of PFAS-containing substances and products**, recognising that PFAS pollution does not stop at borders and that imported PFAS will continue to contribute to contamination of European ecosystems.

Europe's strategic objective must be clear: **no further accumulation of PFAS in the environment is acceptable**. For this reason, European regions and cities unequivocally support a universal and ambitious restriction, with as few exemptions as possible and with strict, time-limited derogations only where absolutely necessary.

b. Revision of REACH: urgency and the need to reinforce the precautionary principle

REACH remains one of the EU's most powerful instruments for chemical risk management, but it requires an urgent update to ensure that the **precautionary principle** is consistently and effectively applied. The revision - initially expected during the 2019–2024 mandate - has been repeatedly postponed, leaving authorities, industry, and citizens without clarity on future regulatory pathways.

Local and regional authorities call for the swift publication of the European Commission's proposal for the revision of REACH. The updated framework must reduce procedural delays and accelerate regulatory action on groups of substances such as PFAS. To ensure that the protection of human health and the environment is central to the decision-making process, the new framework should mandate that **industry proves the safety of any substance before it can be authorised for use on the market**.

A modernised REACH is essential to give authorities and industry legal certainty, support innovation in safe alternatives, and ensure European citizens benefit from the highest level of protection.

c. Supporting industrial transition and strengthening capacity for alternatives

A successful PFAS phase-out requires not only strict regulation but also strong support for industry, acknowledging that identifying PFAS uses and adopting viable alternatives can be complex and resource-intensive. A universal restriction should therefore be accompanied by robust capacity-building, research, and guidance to help companies—particularly SMEs—transition to sustainable practices and develop PFAS-free business models.

Europe currently lacks sufficient instruments to support this transition, but local and regional authorities are already taking action to fill the gap:

- **City of Lyon** engages in structured dialogue with businesses and unions to raise awareness of PFAS risks for health and the environment.
- **Lyon Metropole** provides practical support to SMEs for pollution prevention and substitution of PFAS.

⁴ See in this context the Soil monitoring law, the Ambient air quality and cleaner air for Europe Directive, and the legislation connected to the Water Framework Directive.

- **Flanders** is advancing research to create a policy trajectory for PFAS registration in industrial processes and exploring mechanisms to support companies — particularly SMEs — in choosing safer chemicals, including in imported products that may contain PFAS.
- **The city of Düsseldorf** offers SMEs the opportunity to carry out research projects on alternative methods of cleaning PFAS-contaminated groundwater at a polluted site.

To make this transition successful, the EU should provide:

- Funding for research, innovation and development of PFAS-free alternatives,
- Capacity-building and technical guidance for industry in general and SMEs in particular,
- Clear and predictable regulatory pathways to guide long-term investment decisions.

A PFAS-free society is a cornerstone of Europe's green transition and global competitiveness. Supporting industry through this transformation is therefore not only environmentally necessary, but also economically strategic.

2. Detection and remediation of pollution

a. A common framework and new tools for effective detection and remediation

Effective detection of PFAS pollution is essential not only for remediation but also for halting ongoing emissions. Although current data can identify heavily contaminated sites, it often cannot determine the precise sources of emissions or the full extent of pollution. Without a clear understanding of where PFAS originate and how they spread, efforts to contain contamination and prevent further dispersion remain incomplete.

To address this, LRAs need a shared, **science-based European framework** for monitoring and measuring substances of emerging concern across all environments. This framework should include a comprehensive yet feasible list of pollutants to track, harmonised thresholds, and common monitoring methodologies. Establishing a **European catalogue of potential PFAS-contaminated sites** — covering PFAS-relevant industries and the specific substances they use — would further guide monitoring and help prioritise interventions.

The EU can also play a central role in advancing detection technologies by promoting **affordable, adaptable testing methods** capable of analysing complex pollution “cocktails” that reflect the diverse PFAS mixtures found at many sites. In addition, supporting the **development of innovative remediating technologies** is crucial, as such solutions are still largely lacking.

b. Strengthening and simplifying the application of the polluter-pays principle

While the polluter-pays principle should, in theory, ensure that remediation costs are borne by those responsible, its implementation remains perfectible⁵. In particular, LRAs face significant practical barriers as legal action against polluters entails upfront costs, prolonged proceedings, and uncertain reimbursement. Smaller authorities often lack the resources to pursue legal cases, and even larger ones must divert funds from other public needs. Meanwhile, remediation cannot wait and requires urgent action on their part to protect communities and ecosystems.

The EU should simplify legislation to make it easier for local and regional authorities to **hold polluters accountable**. At present, implementation of the polluter-pays principle varies widely, as its effectiveness often depends on the financial and administrative capacity of LRAs to pursue litigation. A

⁵ https://www.eca.europa.eu/lists/ecadocuments/sr21_12/sr_polluter_pays_principle_en.pdf

thorough assessment of how the principle is applied across member states is therefore needed to identify ways to strengthen its implementation without placing overbearing financial or administrative burdens on public authorities.

The European Union should also move forward with the expected revision of the **Environment Liability Directive** and seize this opportunity to include the manufacture, use, storage, processing, filling, release into the environment and onsite transport of PFAS⁶ as one of the activities covered under article 3(1).

c. Tackling orphan pollution

Orphan pollution occurs when no responsible party can be identified or held accountable. This can for instance arise when pollution originates from historical activities, multiple potential sources exist, responsible companies have ceased operations, or contamination is diffuse. In such cases, LRAs can be left to finance remediation themselves, placing undue strain on local budgets.

To fund remediation of orphan pollution, an **Extended Producer Responsibility (EPR) scheme** for PFAS should be set up. Such a scheme would:

- Make manufacturers, industrial users and product sellers collectively financially responsible for remediation costs when no specific polluter can be targeted.
- Secure sustainable funding for cleanup of orphan sites.
- Incentivise the transition to safer, non-PFAS alternatives.
- Raise awareness along the value chain and increase visibility of the environmental costs associated with PFAS use.

This new EPR scheme should apply to PFAS producers, major industrial users and product sellers, recognizing that all contribute substantially to hotspot and diffuse contamination.

By combining technological innovation, strengthened legal frameworks, and financial mechanisms such as EPR, the EU can empower local and regional authorities but also national authorities to detect, remediate, and ultimately prevent PFAS pollution, protecting communities and ecosystems across Europe.

3. Cross-Cutting Needs of Local and Regional Authorities

Beyond the technical and financial challenges of detection and remediation, LRAs face **cross-cutting needs** rooted in their roles and responsibilities as public authorities. To effectively address the PFAS crisis across Europe, the European Union must ensure that they have the recognition, resources, and capacities necessary to act efficiently and collaboratively.

a. Funding support

Tackling PFAS pollution requires substantial financial investment, which must be reflected in the current and the **next Multiannual Financial Framework (MFF)** through:

- Dedicated calls in Horizon Europe and the Competitiveness Fund for proposals to support **research and development of efficient and affordable detection and remediation technologies**, including nature-based solutions, deployable in various local contexts.
- The allocation of **dedicated financial resources to LRAs** (under the future National and Regional Partnership Plans or future EU Facility) for conducting in-depth diagnostics, ensuring

⁶ Both products containing PFAS and PFAS substances themselves.

long-term monitoring of contaminated sites, and carrying out all related actions, including remediation, awareness-raising/communication towards citizens, and the analysis of health implications.

Dedicated **funding to tackle orphan pollution** must also be set up, via a new Extended Producer Responsibility (EPR) scheme to secure sustainable financing and encourage preventative measure chain.

We also encourage the EU to support research on the toxicity of PFAS and other chemical mixtures and the conduct of **large-scale health studies in the territories impacted by PFAS pollution**.

b. Capacity and knowledge building for public authorities

Cities and regions are on the front line of PFAS management but often lack the resources and platforms to share knowledge and develop technical expertise. Faced with similar challenges, several Cities and Regions have come together to set up an informal working group of territories impacted by PFAS pollution⁷. At EU level and amongst local and regional authorities, there is a clear need to better understand the impacts of PFAS exposure, create spaces for mutual learning and dialogue, and share access to data, research results, and practical tools to inform and communicate with affected communities.

The EU should **support and institutionalise the exchange of best practices at the European level and facilitate knowledge sharing between public authorities** to disseminate tools and information, and build local capacity. This could be done as part of a Community of Practice, expert group or Urban Agenda initiative dedicated to PFAS pollution and aimed at strengthening collaboration and capacity-building across member states.

c. Recognition and multi-level governance

Finally, PFAS management highlights the need for **genuine multi-level governance**, where public authorities at local and regional levels are recognised as **key stakeholders for discussions at EU level**. One of the annual high-level political dialogue foreseen as part of the new EU Agenda for Cities could for instance be dedicated to a discussion on PFAS. Cities and regions must also be involved in political and technical discussions related to the evolution of PFAS-related legislation, such as the Water Structured Dialogues to be implemented in 2026 as part of the Water Resilience Strategy.

Our **inclusion in EU-level debates and decision-making** processes is essential to ensure that the practical consequences of PFAS contaminations are properly addressed but also to make sure that policies are realistic, implementable and adequately resourced. Strengthening accountability and coordination across all levels of governance should be a priority of the EU.

By addressing these cross-cutting needs — through dedicated funding, capacity-building initiatives, and meaningful recognition of LRAs' role in multi-level governance — the EU can empower local authorities to act decisively in tackling PFAS pollution, while ensuring that strategies are equitable, coordinated, and effective across Europe.

Addressing PFAS pollution is essential not only to protect public health and the environment, but also to secure Europe's long-term prosperity. By acting decisively now and significantly

⁷ Lyon Metropole, City of Amsterdam, City of Antwerp, City of Düsseldorf, City of Ghent, City of Rotterdam, City of Hamburg, City of Copenhagen, Regional Council of Karlsruhe, Region of Flanders, South Holland Province, City of Lyon, City of Leeuwarden, City of Dordrecht, City of Vantaa, City of Helsinki, City of Berlin, South Denmark Region, Brussels-Capital Region, Central Denmark Region.

reducing PFAS, the EU can position itself as a global leader in building a cleaner, safer and more resilient future, a future that Europe's cities and regions are fully committed to delivering.

Supporting regions and cities

[insert logos and signatures]