Joint Position of ESF, ETSA, EURATEX and FESI on the PFAS Restriction in Personal Protective Equipment, Protective Textiles and Medical Textiles

Reliable Protection for Europe – Securing Industrial Resilience

Personal protective equipment (PPE), protective textiles and medical textiles exist for a single crucial reason: to ensure essential health and safety for European citizens. Emergency responders in flashover conditions. Workers exposed to electric arc, chemicals or mechanical impact. Patients and clinical staff in the operating theatre. People in situations where the protective layer is their only line of defence to protect their lives.

The signatory associations share the objective of restricting PFAS. Avoidable PFAS applications must be reduced, environmental emissions must fall, and unnecessary exposure must be prevented. The issue is not whether Europe should move away from avoidable uses of PFAS. The issue is how Europe can do this without weakening protection, legal certainty, enforcement and European industrial capacity.

PPE is rarely a single textile. A firefighter ensemble brings together garments, gloves, boots, a helmet, a visor and respiratory protection, each with distinct material chemistries and distinct performance requirements. The role of fluorinated chemistries in PPE goes well beyond surface repellence. It extends to heat and chemical resistance in complex polymer assemblies, membrane technologies, optical components, and respiratory protection materials. Any regulatory approach that frames PPE as solely a textile question will miss the technical realities of the products it seeks to govern.

The picture is simple. **We are weaving the new net under the PFAS restriction. It must hold before the old one is rolled up.** While work continues on the new net, the old one remains in place. No one falls through, neither today nor tomorrow. This applies in equal measure to the wearer of the high-visibility jacket, the wearer of the heat and flame ensemble, the doctors, surgeons, and clinical staff in the operating room, and the responder at the scene of a major incident.

The European industry supports a phased and pragmatic restriction of the intentional use of PFAS in non-essential applications. We commit to researching, qualifying, testing, and certifying alternatives where technically possible. In return, we ask for a regulatory framework that provides the time required, reliable analytical methods, and an effective enforcement architecture.

First condition: time for qualified substitution

Substitution is not the replacement of one substance by another. It runs as a multi-step chain across chemical supplier, material producer, component manufacturer, system integrator, notified body and end user. For complex articles assembled from textiles, polymers, membranes, coatings and metals, qualification of the alternative must be repeated across each component and validated for the system as a whole. For each affected product, these steps add up to several years, and in combined protection categories, to considerably longer periods.

The economic dimension is substantial. Research and testing costs are incurred separately for each product family and each normative variant. Notified Bodies are a finite bottleneck. Small and medium-sized European manufacturers can shoulder this burden only where the regulatory timeframe genuinely permits qualification. PPE and medical textiles are also a small market in terms of volume compared to consumer textiles. Public funding for the development of alternative risks bypasses these high-responsibility, low-volume applications precisely unless explicitly directed toward them.

Based on the qualification pathways foreseeable today, the transition periods of 12 and 13.5 years currently under discussion will not suffice for several protection categories. The same considerations apply to recycling pathways, where the handling of articles placed on the market under prior rules remains unresolved. We therefore propose a differentiated transition structure that recognises the full scope of PPE risk categories, the complex article reality of many products and the unresolved recycling pathway. While some alternatives may pass laboratory tests, in certain cases they may not fulfil their intended function under real-life conditions. Therefore, real-life validation is essential to guarantee the health and safety protection of the EU citizens.

Second condition: reliable analytical methods

A restriction is only effective where compliance can be verified. For textile matrices, the limit values currently under discussion are well below the quantification limit of the standardised analytical method under EN 17681-1:2025 . For non-textile components of PPE, such as visors, membranes, optical filters, and respiratory protective materials, no comparable standardised method exists. The result is, currently, a broad scope of substances and applications for which compliance is required but cannot be verified. For the compliant manufacturer, this means legal uncertainty. In market surveillance, it refers to a requirement that cannot be enforced. The legal text itself must be enforceable: the huge number of implementing guidelines foreseen in the Draft SEAC Opinion cannot replace clear legal definitions in the restriction itself.

Third condition: effective enforcement architecture

A restriction enforced solely against the European manufacturer achieves the opposite of its purpose. Three elements are essential. First, an enforceable legal text rather than a deferral to subsequent guidelines. Second, harmonised application across Member States, instead of the current fragmentation that creates compliance burdens for any company operating in more than one national market. Third, market surveillance capacity, including the resources to act on imports supplied directly to end users in the Union through digital platforms. Without these elements, demand shifts from the regulated European manufacturer to uncontrolled direct imports, and the restriction delivers neither the protection gain it promises nor the level playing field that European industry needs.

The labelling obligation foreseen by RAC and SEAC for derogated uses illustrates the same problem in concentrated form. Without standardised methods and enforceable limit values for complex articles, it cannot be applied harmoniously, it falls disproportionately on the compliant European manufacturer who is already investing in substitution, and it delivers no environmental gain. It should not enter into force before the analytical preconditions are met. .

Strategic dimension: protection as part of European sovereignty

PPE, protective textiles, and medical textiles underpin occupational health and safety in key industrial sectors, the operational readiness of fire and rescue services and civil protection, the security of supply in healthcare, and the protection of critical infrastructure. The pandemic served as a reminder of what short-term dependence on non-European supply chains in precisely these areas means. A regulation that accelerates the market exit of European manufacturers without subjecting imported goods to the same standard does not provide a substitute. It delivers dependence. Strategic autonomy is therefore not an industrial policy preference but the precondition for Europe to remain capable of acting in a crisis.

Key Conditions for Implementation

The signatory associations support a phased and pragmatic restriction of intentional, non-essential PFAS uses. At the same time, they call on the European institutions to ensure three key framework conditions for implementation:

- sufficient transition periods for the qualification and certification of alternatives across the full range of PPE applications;
- proportionate and workable limit values supported by reliable and harmonised analytical methods for both textile and non-textile materials; and
- effective and enforceable legislation based on clear legal definitions and requirements.

These conditions are necessary to maintain the availability, performance and reliability of protective equipment and other critical applications manufactured in Europe, while enabling a realistic and legally robust transition away from PFAS where suitable alternatives exist.

Fact box

What we ask the European institutions to provide

1. Derogation across the full scope of PPE in line with the dossier submitters' broader framing, encompassing risk Category II applications (e.g. cut resistant gloves with glass fibre reinforcement, high visibility clothing, , face shields) alongside Category III.

2. A differentiated transition structure for high risk and combined protection categories, with periods reflecting the realistic multi step qualification chain across components and system level certification.

3. Clear legal definitions of "PFAS" and "related substances" anchored in the restriction text itself, rather than deferred to subsequent guidance documents.

4. Harmonised application across Member States, avoiding parallel national accelerations and divergent interpretations.

5. Resolution of the analytical mismatch between required limit values and standardised method capability. The limits of quantification (LOQs) of state of the art analytical methods, including EN 17681-1:2025, are in some cases higher than the proposed regulatory thresholds. For fluorinated polymer precursors with side chains, for example, LOQs may range between 100 and 400 ppb for key analytes (single substance excluding degradation products), while proposed limit values are as low as 25 ppb. As a result, demonstrating and verifying compliance is currently not always technically achievable using existing analytical methods. Limit values must be anchored to the limit of quantification of the prevailing standardised method. Standardised methods for non-textile PPE components must exist before limit values for those matrices enter into force.

6. The labelling of PFAS proposed by RAC and SEAC for all manufacturers, importers and users of PFAS should be delay at until standardised/validated test methods for all media including articles or complex articles are available. Labelling, if required should not create an economic burden without an environmental benefit or meet the purpose of the Universal PFAS restriction.

7. Resources for market surveillance, including effective controls on imports supplied directly to end users in the Union through digital platforms.

8. Clarity on the treatment of recycled content and of articles already placed on the market under prior rules.

Core technical findings

For textile matrices, the limit values around 25 ppb foreseen in the restriction debate lie one order of magnitude below the limit of quantification of the relevant standardised analytical method under EN 17681-1:2025 (up to 400 ppb). From a legal perspective, this gap between required limit and method capability conflicts with the principle of legal certainty anchored in both constitutional and Union law.

References

Quednau, W. / Biskup, D. / Meggyes, J., PFAS in textiles: limit values, detection and regulatory consequences,
StoffR 1/2026

Example of effect of alternative in real life conditions : a Firefighter's roadmap to the transition to non-PFAS gear – start watching at minute 50 : https://www.youtube.com/watch?v=r6WLtl-zCBw

Reference standards

EN 17681-1:2025 (extractable PFAS in textiles). EN ISO 13688 (general requirements for protective clothing). EN ISO 11612 (heat and flame). EN 61482-2 (electric arc). EN 13034 (chemical splash). EN ISO 20471 (high visibility). EN 388 (mechanical risks, including cut resistance). EN 469:2020 (Protective clothing for firefighters).

Regulatory framework

Regulation (EC) No 1907/2006 (REACH), Annex XVII. Regulation (EU) 2016/425 on personal protective equipment. Regulation (EU) 2019/1021 on persistent organic pollutants. Draft SEAC Opinion in the ongoing PFAS restriction procedure.

The undersigned,

The European Safety Federation (ESF) represents the economic operators and service providers of PPE for professional use. Through national member organisation, we represent over 700 different companies, of which at least 75% are SMEs. Recent crises show the strategic importance of PPE, including the management of the supply chains and the need for European production of innovative and sustainable PPE.

The European Textile Services Association (ETSA) represents the textile services sector in Europe, including industrial laundry and rental of professional textiles such as workwear, PPE and flat linen. With ETSA members generating over €11 billion annually, the sector operates circular models based on reuse, maintenance and extended product lifetimes, ensuring high levels of hygiene, durability and above all worker safety across key industries.

As the voice of the European textile and clothing industry, EURATEX works to achieve a favourable environment within the European Union for design, development, manufacture and marketing of textile and clothing products. The EU textile and clothing industry is an essential pillar of the local economy across many EU regions. With €64 billion of exports, the industry is a global player successfully commercializing high added value products on growing markets around the world..

Founded in 1960 FESI - the Federation of the European Sporting Goods Industry represents the interests of approximately 1.800 sporting goods manufacturers and retailers (90% of the European market) through its national and regional sporting goods industry federations and its directly affiliated member companies. In total, the European Sporting Goods Industry employs over 700.000 EU citizens and has an annual turnover of some 81 billion euro.