



A FEBELSAFE EU POLICY BRIEF ON:

Lessons from the French PFAS Framework for PPE and Workwear

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Executive Summary

PFAS regulation is becoming one of the most sensitive and politically charged policy files in Europe. While the European Chemicals Agency (ECHA) is preparing a universal PFAS restriction under REACH, several Member States are already moving ahead with national measures.

In December 2025, France adopted Decree 2025-1376 introducing a general ban on all PFAS in a wide range of consumer and professional products, including textiles and footwear, while simultaneously establishing a clear and legally robust system of functional exemptions for critical safety and health applications.

From a Belgian industry perspective, the French framework currently represents the most balanced regulatory model in Europe: ambitious for public health and environmental protection, yet technically workable for essential safety applications such as personal protective equipment (PPE), medical textiles and industrial technical textiles.

This policy brief summarises the key elements of the French approach and formulates recommendations for European policymakers, ECHA and sector federations.

1. Policy context

PFAS substances are persistent, mobile and highly resistant to degradation. Their accumulation in the environment and the human body has generated widespread public concern and political momentum for action.

At EU level, a universal PFAS restriction proposal is under development under the REACH Regulation. In parallel, several Member States are adopting national legislation to accelerate risk reduction.

This regulatory landscape creates an urgent need for:

- legal clarity;
- technical feasibility;
- protection of essential safety functions;
- coherence with the EU internal market.

2. The French PFAS framework (Decree 2025-1376)

On 28 December 2025, France adopted Decree No. 2025-1376 on the prevention of risks resulting from exposure to per- and polyfluoroalkyl substances (PFAS).

Core principles

2.1 Broad substance definition

All substances containing fully fluorinated CF_2 or CF_3 structures fall under the PFAS definition. No positive lists, no individual substance exemptions.

2.2 General ban on PFAS-containing products

From 1 January 2026, the manufacture, import, export and placing on the market of PFAS-containing products is prohibited for:

- textiles;
- footwear;
- cosmetics;
- waterproofing agents;
- ski waxes.

A 12-month sell-through period applies to products manufactured before that date.

2.3 Functional exemptions for essential uses

The French framework introduces legally defined exemptions where PFAS use remains technically necessary and no suitable alternatives exist, including:

- Personal Protective Equipment (PPE) under Regulation (EU) 2016/425;
- defence, civil protection and security equipment;
- medical textiles and healthcare applications;
- industrial technical textiles;
- maintenance and re-impregnation products for PPE.

2.4 Recycling exemption

Textiles and footwear containing at least 20% post-consumer recycled fibres may contain proportionate residual PFAS due to historical contamination of recycled materials.

2.5 Enforcement via end-product control

Compliance is assessed through laboratory testing of final products and technical documentation by manufacturers and importers.

3. From substance-based to application-based regulation

Traditional PFAS regulation has focused on individual substances or sub-groups, leading to:

- complex regulatory lists;
- legal uncertainty;
- constant substitution by new PFAS;
- enforcement difficulties.

The French model introduces a paradigm shift:

PFAS are prohibited as a principle, but allowed where their function is essential and irreplaceable.

This application-based approach provides stronger legal certainty and better protection of critical safety functions.

4. The critical role of PPE and professional protective systems

PPE constitutes the last line of defence against residual occupational risks such as:

- chemical exposure;
- oil and solvent contamination;
- acids and bases;
- fire and heat;
- biological hazards.

These protective functions are defined under Regulation (EU) 2016/425 and harmonised European standards.

For several high-risk applications, PFAS-based technologies currently remain the only solution capable of combining oil, solvent, acid and base repellency with mechanical and thermal protection.

A blanket PFAS ban without functional exemptions would result in:

- non-compliant PPE;
- increased occupational risk;

- unacceptable safety levels;
- conflict with EU occupational safety legislation.

5. Maintenance, re-impregnation and the circular use of PPE

Modern PPE systems are designed for repeated use through professional maintenance and laundering services. These include:

- industrial cleaning;
- inspection and quality control;
- re-impregnation;
- re-certification.

Without re-impregnation, essential protective properties deteriorate, leading to contamination risks and loss of conformity.

The French framework explicitly recognises maintenance and re-impregnation agents for PPE as part of the essential safety function.

This enables:

- longer product lifetimes;
- circular business models;
- reduced waste;
- efficient use of public resources.

6. Recycling and circular economy

Textile recycling is a strategic pillar of European circular economy policy. However, historical textiles may contain residual PFAS from past applications.

Without a recycling exemption:

- textile recycling would become legally impossible;
- secondary raw materials would disappear from the market;
- circular targets would become unattainable.

The French model pragmatically recognises this reality.

7. Why the French model matters for Europe

The French framework demonstrates that it is possible to:

- implement ambitious PFAS risk reduction;
- maintain critical safety functions;
- ensure legal clarity;
- preserve industrial feasibility;
- support circular economy objectives.

It provides a concrete regulatory blueprint that can inform the ongoing EU PFAS restriction process under REACH.

8. Recommendations

Febelsafe recommends that European policymakers and ECHA consider the following elements when finalising the EU PFAS restriction:

1. Adopt a broad PFAS definition covering all CF_2 and CF_3 based substances;
2. Introduce a general prohibition on non-essential PFAS uses;
3. Establish legally robust functional exemptions for:
 - PPE and occupational safety equipment;
 - defence and civil protection;
 - medical and healthcare textiles;

- industrial technical textiles;
 - maintenance and re-impregnation systems;
4. Include a recycling exemption for post-consumer textile fibres;
 5. Base enforcement on end-product compliance.

Conclusion

The French PFAS framework shows that environmental ambition and occupational safety can be reconciled.

Europe now has the opportunity to build a coherent and future-proof PFAS regulatory model that protects both the environment and the people who depend on professional protective systems every day.

Find the policy paper also on our website www.febelsafe.be

About Febelsafe

Febelsafe is the Belgian federation representing manufacturers, distributors, service providers and professional end users active in personal protective equipment (PPE), workwear & professional textiles.

Its members cover the full professional value chain, including product development, certification, distribution, leasing, laundering, maintenance and end-of-life management.

Febelsafe promotes product safety, regulatory compliance, quality and sustainable innovation in PPE and workwear applications. The federation actively contributes to European and national policy development in the areas of product safety, chemical regulation, market surveillance, ecodesign and circular economy.

Through expert working groups, standards engagement and dialogue with public authorities, Febelsafe supports the development of technically sound, legally robust and practically workable regulation for the sector.

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