

KIMO UK Submission to Call for Evidence from UK Parliament Environmental Audit Committee – 25 May 2025

Addressing the risks from Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS)

KIMO is a network of local governments, working together for healthy seas, clean beaches, and thriving coastal communities. With over 70 member municipalities in eight countries, it represents more than six million citizens in Europe. KIMO stands for *Kommunernes Internationale Miljøorganisation* (Local Authorities International Environmental Organisation) and was founded in Denmark in 1990 with a mission to prevent pollution and to protect, preserve and enhance the seas and coastal waters of the North-East Atlantic and Baltic regions.

KIMO members work to find, implement and share positive solutions to tackle the most pressing challenges facing the marine environment and to influence decision makers at regional, national and international levels. Members exchange knowledge and experience nationally and internationally, keep up to date with important developments in laws and regulations and develop projects with real local impacts.

KIMO UK is a network of the UK members of KIMO. We note that the Call for Evidence makes no specific mention of the levels, behaviours and risks of PFAS in the marine environment. There are several issues and implications. Put in the simplest terms:

We need to know what levels of PFAS exist in the North Sea, and the implications this has for:

- Marine ecosystems
- Seafood
- Agricultural land and products exposed to sea spray

We need to understand the levels of PFAS entering the North Sea from:

- Rivers and streams
- Wastewater and sludge from sewage treatment plants
- Flue gas from incineration plants

We need to understand the implications for coastal communities in terms of:

- Public health
- Economic cost

There is a considerable lack of knowledge about the extent of the PFAS problem, in the UK, Europe and globally, but it is clear that tighter restrictions need to be imposed and monitoring increased to ensure that inputs to the aquatic environment are slowed down via cleaning and phasing out. The knowledge base must be significantly increased and sources of PFAS better identified. We do not know how many PFAS originate from rivers and streams flowing into the North Sea. We have not sufficiently measured PFAS in the discharge of general wastewater effluent or from diffuse emission from the exhaust of incineration plants. We do not know how harmful each of these individual PFAS substances is.

There needs to be a plan for phasing out and banning of harmful PFAS and efforts must be made to prevent PFAS entering the marine environment. PFAS substances in wastewater from sewage treatment and from flue gas from incineration plants need to be better regulated. Municipalities need guidelines for handling wastewater and sludge from sewage treatment plants. Cleaning must be optimized, primarily at the source and secondarily at treatment plants. Financial aid for modern

cleaning technology must be made available - tests with modern cleaning methods show that some PFAS compounds can be cleaned out of water. Finally, a robust monitoring strategy and stricter limit values and guidelines are needed. A monitoring program should be initiated that exposes the concentration and quantities of PFAS in the marine environment, streams, lakes, groundwater, but also in fish, shellfish, mussels and marine mammals as well as meat, milk, eggs, fruits and vegetables in coastal regions. Development of standardized methods for sampling must therefore also be in place.

KIMO UK, echoing the Resolution passed unanimously by KIMO International on 7 October 2022, which recognizes the need for a clean environment in and around the North Sea and the threat posed to marine ecosystems and coastal communities' economies by release of PFAS into the marine environment, urges the UK Government to:

1. Impose a total ban in the United Kingdom on the whole group of PFAS compounds
2. Conduct research into the wider impacts and behaviour of PFAS in the marine environment and encourage systematic monitoring and sampling programmes to measure the effects of these compounds in the environment, including in marine wildlife
3. Strictly regulate discharge limits of PFAS from industrial effluent, sewage treatment and waste management sites including flue gas from incinerators, with effective programs for monitoring and assessment.
4. Support the development of effective cleaning technologies to remove PFAS and other hazardous chemicals from the treatment of wastewater before it enters the marine environment.
5. Support initiatives to investigate the spread of PFAS in the ocean, including spread to the Arctic and other uninhabited regions.
6. Support initiatives that investigate the risk of pollution from PFAS spreading from the marine environment to land, for example by sea foam, and the impacts on food resources in coastal zones.

There is much that the UK can learn from other European countries, and KIMO UK is uniquely placed to help facilitate such knowledge exchange, being part of a multinational PFAS Working Group within KIMO that exists to:

- Collate the most up to date research / statistics on the extents and impacts of PFAS pollution.
- Identify and cooperate with any other stakeholders with similar goals (e.g. North Sea Commission)
- Identify key actions required from industry to limit the spread and impacts of PFAS pollution and any legislation needed to ensure them.
- Look at what is already going on politically (internationally and within the EU) and decide how best we can influence this to achieve KIMO International goals.

EUROPE

In addition to the KIMO Resolution, KIMO has a joint resolution with the North Sea Commission which can be accessed at [NSC & KIMO Joint Statement – PFAS ‘forever’ chemicals – CPMR North Sea Commission](#). The organisations are jointly hosting a webinar exploring regional and local perspectives



on PFAS on 4th June 2025. Registration is possible at [Upcoming NSC Thematic Webinar: The Regional and Local Perspectives on PFAS – CPMR North Sea Commission](#)

KIMO is an Observer organisation within OSPAR, contributing to the work of the Environmental Impacts of Human Activities and Hazardous Substances and Eutrophication Committees. An OSPAR background document on PFAS can be found at [documents](#).

SWEDEN

The Swedish network within KIMO recently published a report on PFAS in the marine environment that can be accessed at [KIMO Sweden's new report helps municipalities to combat PFAS pollution – KIMO](#)

In December 2023, the Supreme Court in Sweden ruled that more than 150 residents in Ronneby, who have high levels of PFAS in their blood as a result of PFAS-contaminated drinking water, have suffered personal injury within the meaning of the Product Liability Act. [The Supreme Court delivers judgment in PFAS case - The Supreme Court](#). The lawsuit was filed against the municipal water company, but the source of the PFAS was firefighting foam used in fire drills at nearby Blekinge Air Wing,

The Swedish armed forces were successfully sued over PFAS contamination at Ärna Airport, with their appeal being denied in April 2025 [Swedish Armed Forces lose dispute over PFAS contamination](#)

DENMARK

In 2024 Denmark set up a Knowledge Task Force for PFAS. Information can be found at [Knowledge Task Force for PFAS - Danish EPA](#).

Information on a Danish research project working to capture and break down PFAS can be found at <https://ingenioer.au.dk/en/current/news/view/artikel/danish-research-team-aims-to-develop-a-single-step-solution-to-remove-and-break-down-pfas>>

In 2024 the Danish government agreed to allocate 404 million Danish Kroner for a national PFAS Action Plan [Cover ØU-KU-IU](#)

The Danish government will ban on PFAS in clothing and shoes (from 1 July 2026) [PFAS-handlingsplan: Regeringen vil indføre dansk forbud mod PFAS i tøj og sko - Regeringen.dk](#)

THE NETHERLANDS

The Joint Research Programme of KWR (kwrwater.nl) in the Netherlands produced a report on PFAS in sea spray aerosols in June 2023, [BTO 2023.047 - PFAS in Sea Spray](#)

In Veere Municipality soil research has been undertaken to measure the spreading of PFAS inland due to sea-spray. Soil drills were placed at multiple locations across the coastline. They were placed in a row starting from the first row of dunes further inland and over 250 soil samples were analysed. The effect of sea-spray is seen up to 600 metres inland along with high levels of PFAS compared to locations further inland. The spread was influenced by landscape, soil type and organic matter – a high percentage of organic matter causes less spread in deeper soil layers. Wind has not yet proven to be a major factor.

There are cases of high levels of PFAS in blood and meat of cattle grazing in the areas that show high levels of PFAS due to sea-spray. Those cases are still under further investigation. Problems in the area include daily consumption of locally grown fruits and vegetable and reuse of soil excavated from the



area. The national government is working on research into the long-term environmental and health effects of the spread of PFAS due to sea-spray. Veere is on the advisory committee. Several municipalities are also investigating high levels of PFAS in sewage.

The Department of Waterways and Public Works is doing research into the wider impacts and behaviour of PFAS in the marine environment of the Westerschelde, which is highly polluted due to (illegal) discharges of PFAS into the water system. The research stops where the Westerschelde and North Sea merge.

KIMO UK would welcome any opportunity to contribute further to discussions on assessing the risks from Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS).