

MUNICIPAL POLICY GUIDANCE

COMBATING PFAS POLLUTION

A Strategic Framework for
Prevention, Procurement,
and Protection

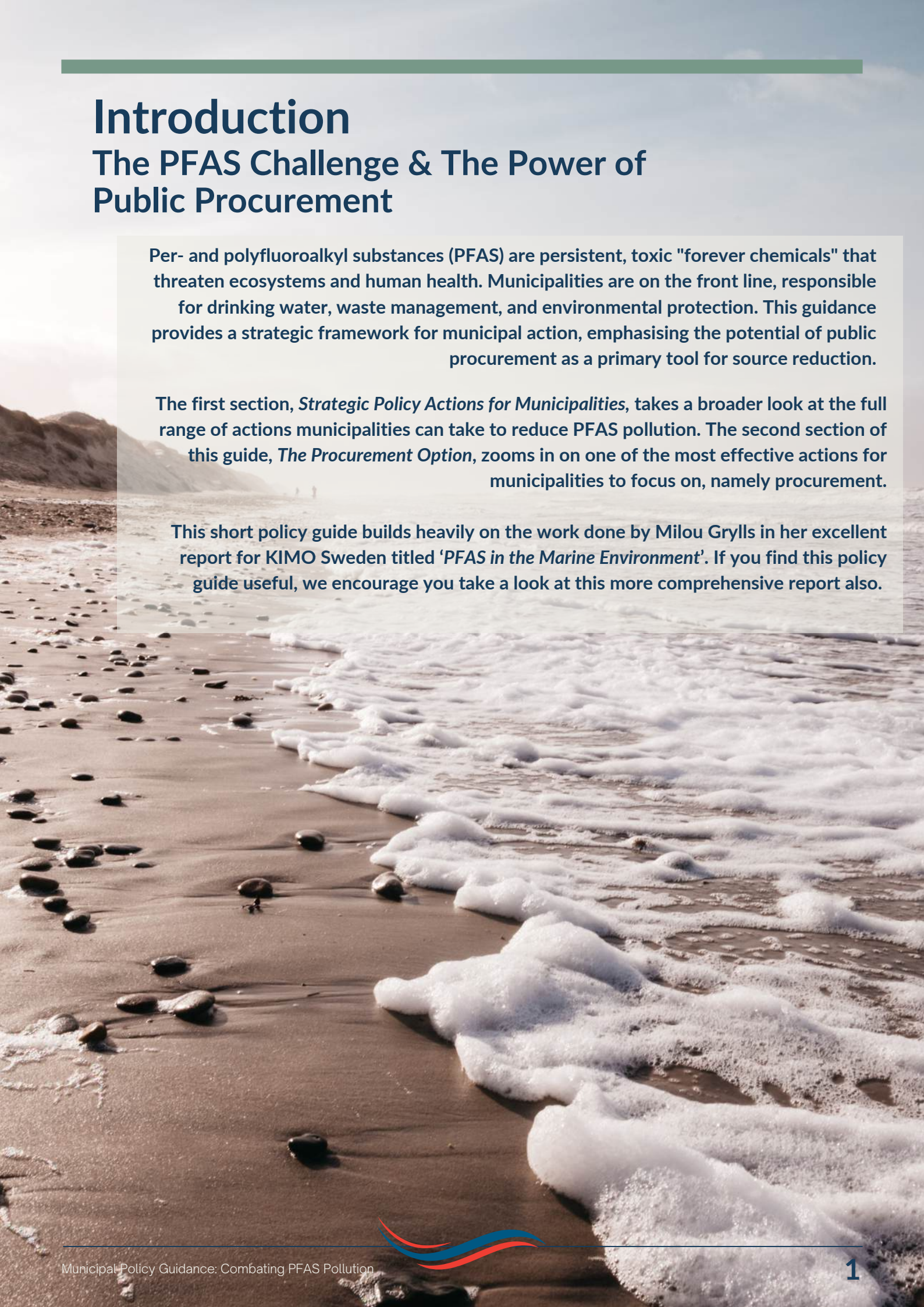


Municipalities for
Sustainable Seas



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Introduction

The PFAS Challenge & The Power of Public Procurement

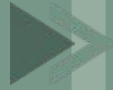
Per- and polyfluoroalkyl substances (PFAS) are persistent, toxic "forever chemicals" that threaten ecosystems and human health. Municipalities are on the front line, responsible for drinking water, waste management, and environmental protection. This guidance provides a strategic framework for municipal action, emphasising the potential of public procurement as a primary tool for source reduction.

The first section, *Strategic Policy Actions for Municipalities*, takes a broader look at the full range of actions municipalities can take to reduce PFAS pollution. The second section of this guide, *The Procurement Option*, zooms in on one of the most effective actions for municipalities to focus on, namely procurement.

This short policy guide builds heavily on the work done by Milou Grylls in her excellent report for KIMO Sweden titled '*PFAS in the Marine Environment*'. If you find this policy guide useful, we encourage you take a look at this more comprehensive report also.

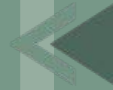
A Multi-pronged Strategy

Mandate PFAS-Free Procurement



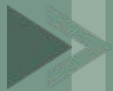
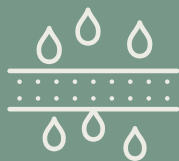
Municipalities are not just obligated to follow laws; they have the power and responsibility to demand PFAS-free alternatives from their suppliers, shaping the market and reducing pollution at its source.

Upgrade treatment plants with Granular Activated Carbon (GAC) or ion-exchange filters to capture PFAS. Mandate PFAS testing in sewage sludge before agricultural application.



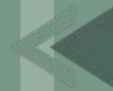
Water & Wastewater Management

Contaminated Site Remediation



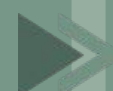
Map and investigate historical contamination sites. Pilot innovative remediation technologies like foam fractionation for groundwater.

Monitor sea spray & coastal soil for PFAS deposition. Restrict grazing & cultivation in identified high-risk zones near the coast.



Coastal Protection

Prevention & Source Control



Enforce strict permit conditions for industries and facilities (e.g., airports, fire training grounds) to prevent PFAS discharges.

Implementation Framework

Building Municipal Capacity: How to Get Started



1. Establish a PFAS Task Force

Create a cross-departmental team (Environment, Procurement, Water, Rescue Services) to coordinate strategy.

2. Train Procurement Officers

Ensure staff are trained on PFAS procurement criteria, (e.g. those from the Swedish National Agency for Public Procurement) how to use ecolabels, and how to write effective PFAS-related requirements in tenders.



3. Prioritise Product Groups

Start with high-impact procurement areas (textiles, cleaning products, firefighting foam) before expanding to other categories.

4. Join Collective Agreements

Utilize the market power of collective purchasing frameworks to amplify demand for PFAS-free products.



Implementation Framework

Collaboration & Advocacy



Advocate for Stronger Regulation

Use your KIMO membership to advocate for stricter and more ambitious regulation of PFAS at both national and international levels.

Join a PFAS Network (such as KIMO's PFAS Working Group)

Participate in this knowledge-sharing forum for authorities, municipalities, and researchers.



Collaborate with Regional Authorities

Work with Regional Administrative Boards on monitoring and enforcement programs.



The Procurement Opportunity

In Sweden alone, nearly SEK 800 billion (€72 billion) is spent annually on public procurement—accounting for almost one-fifth of Sweden's GDP. While the exact figures may differ across countries, the fact remains that municipalities, regional, and national authorities possess immense market power.

In Sweden this spending is governed by the Public Procurement Act ('Lagen om offentlig upphandling'), which not only permits but encourages the use of environmental requirements to drive sustainable development and achieve national environmental quality objectives.

Based on experiences from Sweden we recommend municipalities to take the following steps.



1. A structured approach to public procurement criteria

The Swedish National Agency for Public Procurement has developed a tiered model for incorporating sustainability criteria. Municipalities should apply this model to all relevant product groups.

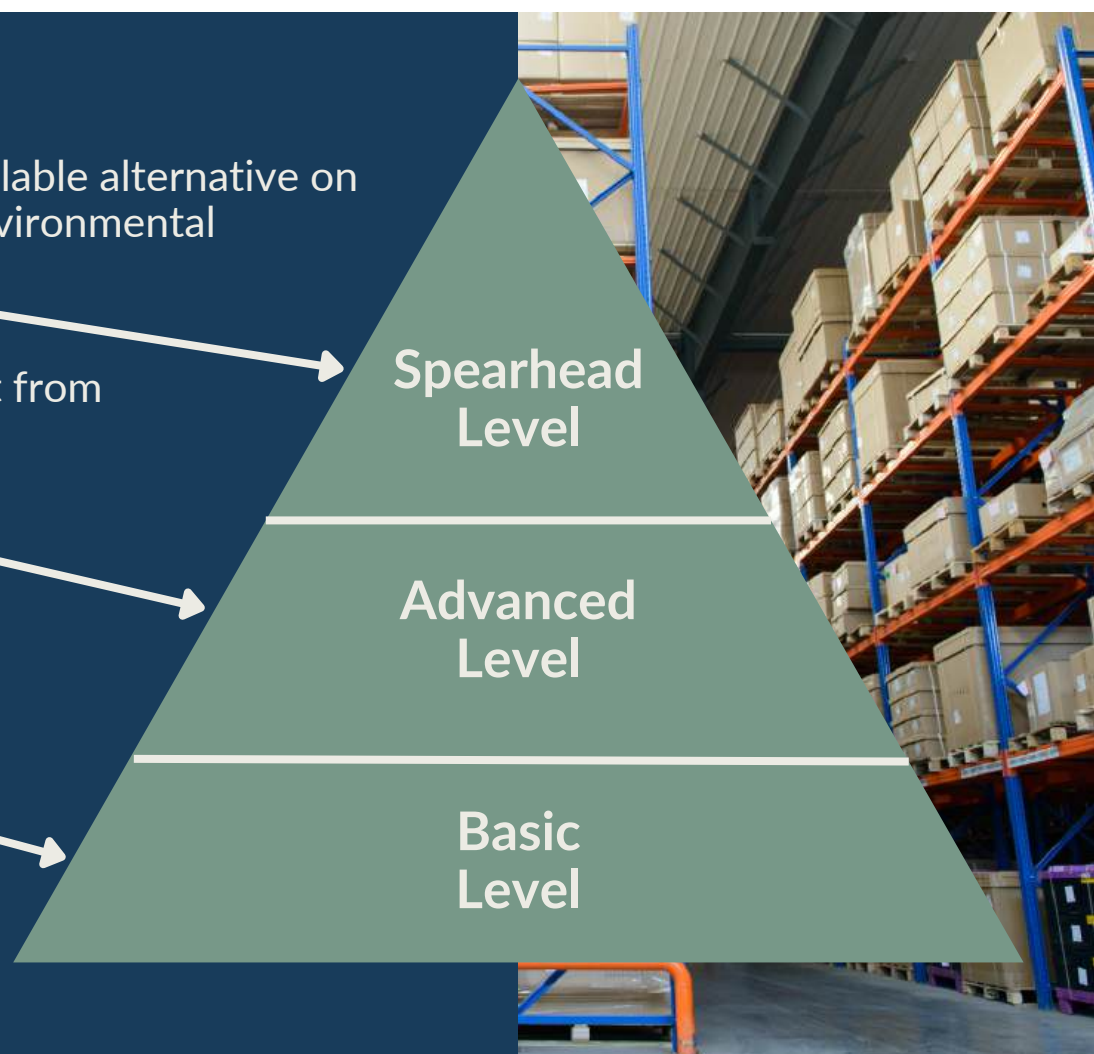
For PFAS, as Substances of Very High Concern, the Swedish National Agency for Public Procurement has specific criteria for the following product groups:

- Medical consumables (advanced level)
- Dirt and oil-repellent textiles (advanced level)
- Water-repellent or waterproof textiles (basic level)
- Laundry and textile service (advanced level)
- Professional hygiene, cleaning and maintenance products – chemical products (advanced level)

Demands the best available alternative on the market from an environmental perspective.

Requires greater effort from suppliers in providing evidence and documentation of compliance.

Aims to reduce the majority of environmental impact associated with a product. This is the minimum standard.



2. Use the REACH Regulation's 'Candidate List' to inform procurement contracts

The REACH Regulation (specifically Articles, 57, 59 and Annex XIV) states that no substance on the candidate list of harmful chemicals (which includes many PFAS) may be present in concentrations above 0.1% by weight (1000 mg/kg) in any procured product. This is a powerful, legally sound requirement.

3. Require Third-Party Certification and Ecolabels

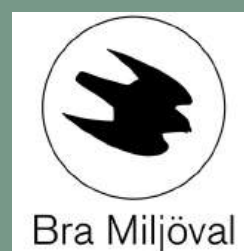
Mandate credible certifications that prohibit PFAS. This shifts the verification burden from the municipality to the supplier and certifying body.

Examples from Sweden:

Nordic Swan Ecolabel: Prohibits PFAS in cosmetics, furniture, textiles, ski wax, building materials, and food packaging.



Bra Miljöval (Good Environmental Choice): Prohibits any PFAS content in impregnation agents, cleaning products, textiles, clothing, and cosmetics.



*OEKO-TEX Certification: An independent global standard for textiles that verifies the absence of harmful chemicals. This was successfully used in the Adda framework agreement for workwear.



4. Lead by Example: Municipal Operations & High-Risk Sectors

Fire & Rescue Services:

Phase out PFAS-containing firefighting foam (class B foam) and implement strict guidelines for foam use, especially in water protection areas.

Example: The Swedish Attunda Fire Brigade has reduced foam use by over 70 percent and on the rare occasions when foam use is necessary, they opt for PFAS-free A-foam

Workwear and Textiles

Leverage power from collective purchasing frameworks

Example: The Swedish purchasing centre "Adda" offers framework agreements that municipalities and regions can join. This purchasing power allows Adda to make tough demands on suppliers, including direct or indirect requirements for PFAS. Adda is owned by the Swedish Association of Local Authorities and Regions and a cohort of Swedish municipalities

Construction & Maintenance

For municipal construction projects, ban PFAS in:

- Paints
- Roofing
- Coatings
- Flooring
- Sealants and Adhesives
- Wires and Cables
- Tape
- Timber-Derived Products
- Solar Panels
- Artificial Turf



From Passive Purchaser to Active Market Shaper

Municipalities have been largely unaware purchasers of PFAS-containing products. But by wielding their formidable procurement power strategically, municipalities can transition from being a part of the problem to becoming the primary drivers of the solution. Demanding PFAS-free products through procurement is the single most effective, immediate, and cost-efficient action a municipality can take to protect public health, the environment, and municipal finances from the lasting burden of "forever chemicals."



Immediate Next Steps

Audit



Review current procurement contracts for high-risk product groups.

Policy



Formally adopt the Swedish National Agency for Public Procurement's advanced-level criteria for textiles and cleaning products.

Educate



Inform all departmental purchasers of the new PFAS procurement policy.

Engage



Contact procurement framework providers to confirm their compliance with PFAS-free requirements.

Appendix 1

The municipalities' broad operational areas entail several opportunities to work with PFAS issues in different ways. A general description of areas where the municipality has the power to act can be found in the table below.

Activity	Example	Responsibility
Supervision	The municipality exercises supervision linked to ports, rescue services, agriculture, industries and other activities, among other things.	Relevant committees
Spatial planning	Physical space in plans for measures as well as location of new activities with regard to the problem.	Relevant committees
Procurement and purchasing	Procurement requirements on, for example, materials and chemical content for goods and services, requirements on the company's own organisation regarding choices and purchasing.	Relevant committees and companies
Operation of services	Operation and maintenance of: • Public buildings and premises, sports facilities, playgrounds. • Streets, parks and coastal areas. • Port operations and small boat operations. • Facilities for stormwater, wastewater and waste. • treatment plants, waste collection and waste management.	Relevant committees, and companies
Communication, collaboration and behavioural influence	Information for the general public, organisations, associations and companies, as well as information for young people via schools and preschools. Targeted campaigns.	Relevant committees and companies
Strategic work	Specific projects on PFAS (e.g. mapping of potentially contaminated areas, cooperation with coastal farmers) Chemicals plan and waste plan. Coordination and collaboration.	Relevant committees
Environmental monitoring	Sampling and investigations	Relevant committees

Appendix 2

Supervision and prevention	
What?	How?
Information	For businesses and developers, the upstream work in all aspects is important (upstream in the catchment area and upstream in the emission hierarchy). Inform about PFAS sea foam before the bathing season, inform residents who grow their own vegetables near the coast, inform about antifouling paint, inform coastal farmers, inform residents with their own wells near the coast.
Guidance	To industries, agriculture, marinas and other businesses. Handling that gives rise to the spread of PFAS can be noted. Information of inappropriate materials or products. Requirements for purification and design regarding the best available technology. Can be added to existing supervisory guidance.
Permits and exemptions	In connection with the municipality receiving referrals, consultations or applications for permits or exemptions, a position/views/conditions can be provided regarding measures or activities that release or risk releasing PFAS.
Injunction or clarification of existing prohibitions	Inspection and injunctions in case of inappropriate handling, inappropriate materials or products, and inadequate protective measures. Ordering the collection and disposal of contaminated water. Requirements for small boat facilities and analysis of PFAS in flush water, information about PFAS paint and alternatives, requirements for analysis of wastewater and sludge.
Special focus	Wastewater discharges, coastal agriculture, beaches, runoff from landfills, areas where the rescue services have been operative, small boat operations, requirements for analysis of sludge (can also be added to existing control plan).
Environmental monitoring	Land, water, animals and plants.

Appendix 2

Water and Sewage	
What?	How?
New technology	Filters in wastewater treatment plants. Filter leachate at landfills.
Information	Campaigns aimed at the general public and operators.
Infrastructure	Requirements for treatment of outgoing wastewater and runoff from landfills, delay and treatment of stormwater, reduced number of overflows, upstream work.
Sludge	Requirements to analyse for PFAS.

Maintenance and Daily Operations	
What?	How?
Infrastructure	Utilise PFAS-free products, e.g. Plastic products
Emission control programme	Wastewater, leachate, relevant activities and industry
Replacement of materials	Chemical products, antifouling paint, fire extinguishing foam, PFAS-free workwear
Technical equipment	When PFAS-free alternatives are available for electronic products, etc., disposal of old technical equipment.
Collection	Collection and finishing of: • Wastewater from wastewater treatment plants • Leachate from landfills • Contaminated sludge • Bilge water
Painting streets and facades	Paint without PFAS

Appendix 2

Strategy and Planning	
What	How?
Procurement requirements	Relevant requirements are set for the municipality's own procurements (construction, facilities, care and operation, cleaning and chemical products (firefighting foam), furniture, toys, pesticides).
Purchase requirements	For the municipality's own operations. Follow-up should take place in the annual report/environmental report.
Spatial planning	Conditions for the appropriate location of businesses, infrastructure or residential areas so that the risk of spreading PFAS is minimized. Physically enable requirements to be set for the design of new activities and infrastructure. For example, designating suitable areas for snow and debris management, enabling appropriate stormwater management, restricting access/preventing the use of contaminated coastal farmland.
Waste plan	Procedures for facilities that contain materials that can cause emissions of PFAS, can be added to existing routines, may require updating of waste plans and/or regulations.
Information	Campaigns, materials, website aimed at the general public, schools and other businesses, officials, operators, businesses, politicians.
Coordination/ collaborations	Water and sewerage, landfills, municipal companies, administrations, other authorities, universities and colleges, organisations, farmers.
Material assessments for goods and services	For the municipality's various activities and for procurement, competence is required to make material assessments. This should also be required of contractors and companies from which the municipality buys goods and services. This can be, for example, for indoor and outdoor facilities, disposable products, wear and tear products.
Circular economy/systems	Phasing out PFAS with economic benefits for other materials due to the unique properties of the substance. There are proven substitutes for many areas today. The PRIO tool on the Swedish Chemicals Agency's website gives companies the opportunity to identify and replace PFAS from their articles or products. ¹⁰⁰



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