

FUNDING PFAS COMPLIANCE

A global guide for water utilities — US, EU, UK, Australia & beyond

Article 1 of 6 | PFAS Series | TheWaterNetwork.com

PFAS SERIES — ARTICLE 2 OF 6

Why Your Jurisdiction Matters More Than the National Regulator

Mapping the global PFAS regulatory patchwork — and what it means for water professionals

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The headline numbers from national regulators tell only part of the story. Across every major market, the regulatory picture at national or subnational level is considerably more complex, more varied, and in many cases more demanding than the top-line standard suggests.

For water professionals operating across borders, advising utilities in multiple jurisdictions, or simply trying to understand what their compliance obligation actually is, navigating this patchwork is now a core professional skill.

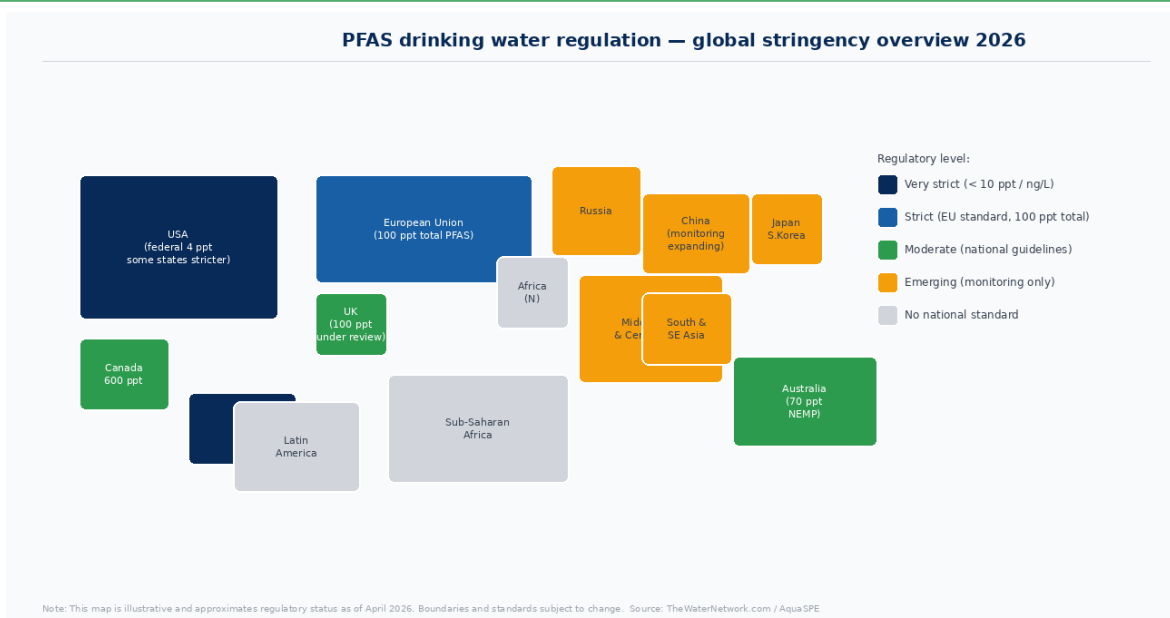


Figure 1: PFAS drinking water regulation — global regulatory stringency overview, April 2026. Source: TheWaterNetwork.com / AquaSPE.

The United States: a state-by-state mosaic

The federal EPA MCLs of 4 ppt for PFOA and PFOS set a national floor — but several states have gone considerably further, and others have set no standards of their own at all. The gap between the most and least regulated US states is striking.

Vermont & Massachusetts — both regulate PFAS at 20 ppt combined, among the most comprehensive state frameworks in the country.

New York — individual MCLs of 10 ppt for PFOA and PFOS, tighter than the federal standard.

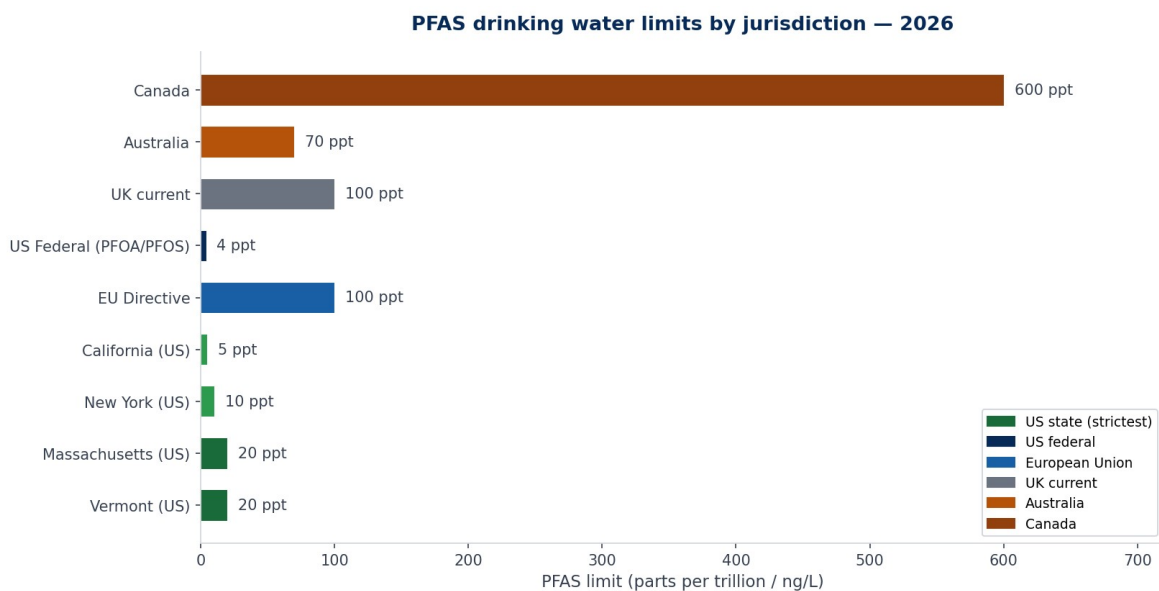
California — 5 ppt for PFOA and 6.5 ppt for PFOS under its own framework, among the strictest nationally.

Michigan — one of the states most severely affected by contamination, with limits varying from 8 ppt to 420 ppt depending on the specific compound.

Many other states — no independent PFAS standards at all, defaulting entirely to the federal MCL.

The implications for multi-state utilities and consulting firms are significant. A utility serving communities across state lines may face different monitoring requirements, different MCLs, and different compliance timelines depending on which side of a state border a wellhead sits.

Regulatory concentration limits for PFAS in US drinking water range from 0.00266 ppt in Nevada (PFOA only) to 400,000 ppt in Michigan (PFHxA only). The federal 4 ppt limit is one point on a very wide spectrum.



Note: values represent the primary headline PFAS limit for each jurisdiction. EU limit is total-PFAS sum (0.1 µg/L = 100 ppt). US state limits shown are for PFOA/PFOS or combined totals depending on state framework. Sources: EPA, DWD, DWI, Health Canada, ADWG 2026.

Figure 2: PFAS drinking water limits by jurisdiction, 2026. Values represent headline limits for PFOA/PFOS or combined totals. Sources: EPA, EU Drinking Water Directive, DWI, Health Canada, ADWG.

The European Union: directive meets divergence

The revised EU Drinking Water Directive, which came into force in January 2026, sets two key limits across all member states: 0.1 micrograms per litre (100 ng/L) for total PFAS sum, and 0.5 micrograms per litre for total PFAS including all detectable compounds. These represent the most comprehensive PFAS drinking water standards anywhere in the world by breadth of coverage.

But implementation is not uniform. Member states have discretion over monitoring schedules, reporting requirements, and the pace at which they require utilities to move from monitoring to active treatment. Germany, the Netherlands, Belgium, Sweden, and Denmark are among the most advanced in treatment deployment. Italy, Spain, and several Eastern European member states are earlier in their compliance journeys.

Importantly, the EU framework also distinguishes between the Drinking Water Directive — which governs what comes out of the tap — and the Water Framework Directive, which governs the quality of water bodies. Both are now incorporating PFAS standards, but the timelines and obligations differ. Utilities drawing from PFAS-contaminated surface water sources face obligations under both frameworks simultaneously.

Total PFAS treatment spending across ten European countries is projected at €3.6 billion between 2026 and 2036 — with Germany, Italy, France, and Spain accounting for around two-thirds of that expenditure. Granular activated carbon will dominate the initial compliance wave, representing around 80% of early spending, before more selective technologies take a larger share as monitoring capabilities mature.

PFAS treatment market — size and technology breakdown

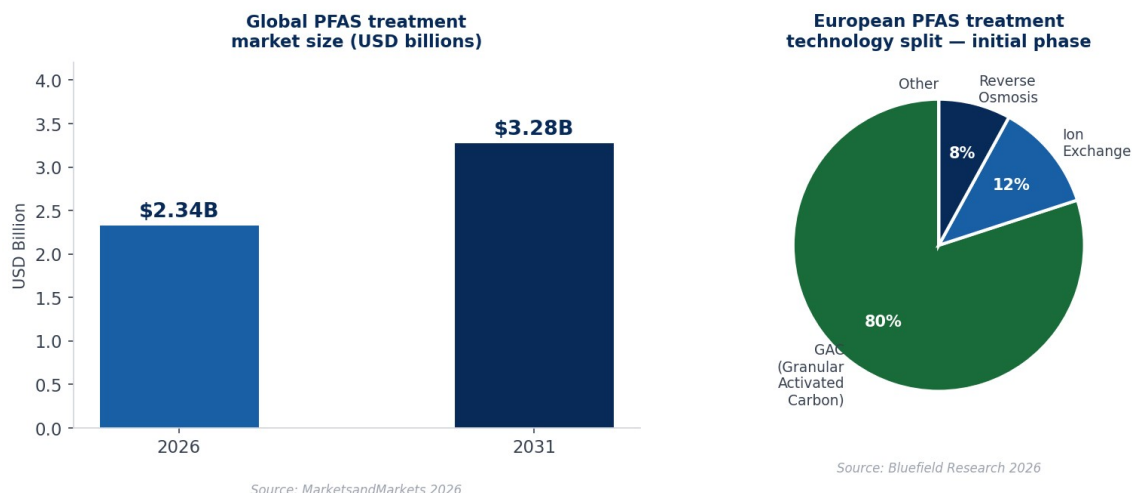


Figure 3: Global PFAS treatment market size and European technology split in the initial compliance phase. Sources: MarketsandMarkets 2026, Bluefield Research 2026.

The United Kingdom: post-Brexit divergence

Since leaving the EU, the UK has retained the previous EU Drinking Water Directive standards for PFAS rather than adopting the new tighter limits that took effect across the EU in January 2026. The UK's current regulatory limit is 0.1 micrograms per litre for PFOA and PFOS individually — less comprehensive than the new EU total PFAS sum approach.

The Drinking Water Inspectorate has signalled that UK standards are under review, but no firm timeline for alignment with the EU's new framework has been announced. This creates a gap: UK utilities are currently held to a less demanding standard than their EU counterparts for the same contaminants, while operating in a market where public and political pressure around water quality is intense.

For the UK water sector, the practical implication is that Ofwat's £104 billion AMP8 investment framework — which runs to 2030 — may need to be revisited if the DWI updates PFAS standards mid-cycle. Utilities would be wise to plan for the more stringent EU standard regardless of what the DWI announces, both to future-proof their treatment systems and to manage reputational risk.

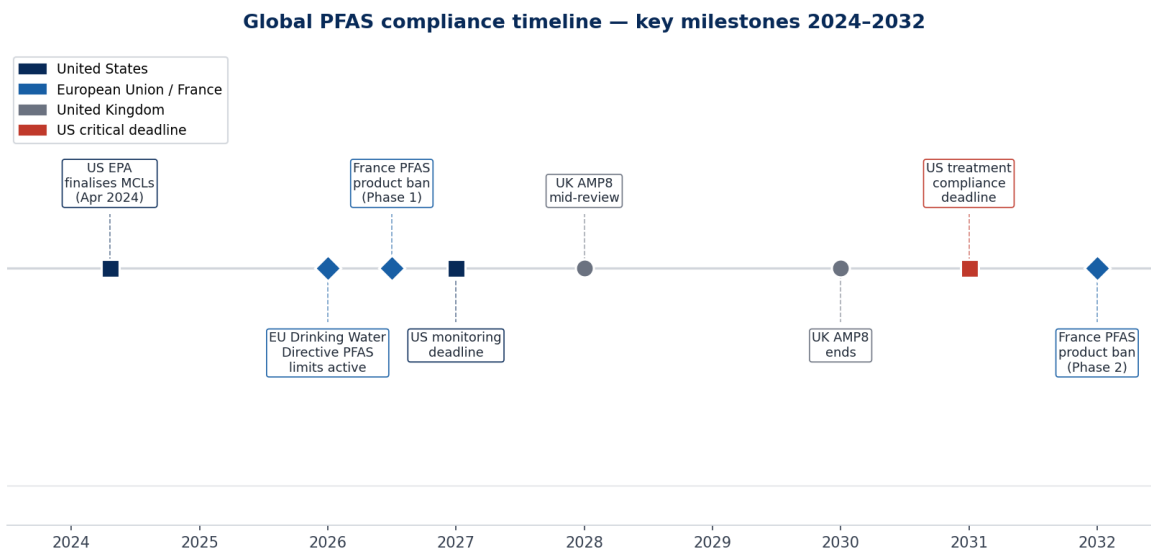
Australia: national guidelines, state implementation

Australia operates through the PFAS National Environmental Management Plan (NEMP), developed jointly by Commonwealth, state, and territory governments. The Australian Drinking Water Guidelines set health-based guidance values of 0.07 micrograms per litre for PFOA and PFOS — less stringent than both the US and EU standards. However, the contamination picture in affected areas is severe, concentrated around 28 priority defence sites where AFFF firefighting foam was used historically. The Commonwealth's PFAS National Coordinating Body, established September 2025, is intended to bring greater consistency to state and territory responses.

Canada: provincial variation

Health Canada's Guidelines for Canadian Drinking Water Quality set a maximum acceptable concentration of 600 nanograms per litre for the sum of PFOA and PFOS — considerably less stringent than the US or EU. However, several provinces have moved ahead of the federal guideline. Quebec, Ontario, and British Columbia have all initiated enhanced PFAS monitoring programmes,

and provincial standards for PFAS in soil and groundwater vary significantly. As with the US state patchwork, Canadian utilities and engineers must track both federal and provincial standards.



Source: EPA, EU Council, Ofwat, DWI. UK PFAS standard review timeline TBC. Australia and Canada timelines not shown — national guidelines under review.

Figure 4: Global PFAS compliance timeline — key milestones 2024–2032. Sources: EPA, EU Council, Ofwat, DWI. UK PFAS standard review timeline TBC. Australia and Canada not shown — guidelines under review.

The direction of travel is clear

Across every jurisdiction examined, the trend line is consistent: more compounds regulated, at lower concentrations, with shorter compliance timelines, and stricter monitoring requirements. No major regulator has moved in the opposite direction on drinking water standards.

For water professionals anywhere in the world, the question is not whether PFAS standards will tighten further. It is only when — and by how much.

The utilities and water professionals who plan to the likely future standard rather than the current one will spend less on system redesign and be better positioned for every subsequent tightening of the rules. For consulting engineers and technology providers, jurisdictional fluency is a genuine competitive advantage. For investors and technology companies, the divergence between jurisdictions creates a sequenced global market opportunity.

PFAS Series — coming next

- **Article 1 — Funding PFAS Compliance: A Global Guide for Water Utilities ✓ Published**
- Article 3 — Europe's PFAS Crackdown: Source Bans, Treatment Standards & What They Mean
- Article 4 — The Hidden PFAS Pipeline: Industrial Discharge and What's Coming in 2026
- Article 5 — The Disposal Dilemma: What Happens to PFAS After You Remove It?
- Article 6 — PFAS and Environmental Justice: Why the Burden Falls Hardest on Vulnerable Communities

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