



SECRETARY OF DEFENSE  
1000 DEFENSE PENTAGON  
WASHINGTON, DC 20301-1000

JUL 31 2025

CLEARED  
For Open Publication

Aug 01, 2025

Department of Defense  
OFFICE OF PREPUBLICATION AND SECURITY REVIEW

The Honorable Roger F. Wicker  
Chairman  
Committee on Armed Services  
United States Senate  
Washington, DC 20510

Dear Mr. Chairman:

Section 322(c) of the National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2020 (Public Law 116-92) prohibits the Department from using fluorinated aqueous film-forming foam (AFFF) at any installation on or after: (1) October 1, 2024; or (2) the date on which the Secretary of Defense determines that compliance with the fluorinated AFFF prohibition is possible. Section 322(e) allows for two waivers of the prohibition for a period of one year each, subject to several conditions. The first one-year waiver was invoked on August 2, 2024, extending the deadline to October 1, 2025. I have determined that the second waiver of the prohibition with a statutory deadline of October 1, 2026 is necessary to sustain the operational availability of sufficient firefighting systems to ensure the protection of life and safety at Department of Defense (DoD) installations and during military operations. This letter provides the required 60 days advance notice to Congress, the necessary certification, and the information required by section 322(e) in support of the waiver.

I hereby certify that this one-year waiver of the prohibition on installation AFFF use is necessary for both installation infrastructure and mobile firefighting equipment. As discussed in the Government Accountability Office (GAO) report titled, "Firefighting Foam: DoD is Working to Address Challenges to Transitioning to per- and polyfluoroalkyl substances (PFAS)-Free Alternatives," GAO-24-107322 (July 8, 2024), replacing AFFF with fluorine-free foam (F3) or another technology (e.g., water-only systems) at approximately 1,000 facilities and over 6,000 mobile assets — all of which have to maintain firefighting capability during the transition — is complex, time-consuming, and supply-constrained. Although the Department has made significant progress in transitioning away from AFFF use, it needs additional time to ensure a methodical and safe transition of approximately 1,000 facilities and over 6,000 mobile assets. I thus certify that the second one-year section 322(e) waiver is necessary for the protection of life and safety.

As explained in the enclosed congressional briefing provided to you on May 23, 2025, over the past several years DoD has prioritized finding effective substitutes for AFFF. The Department published Military Specification (MILSPEC) MIL-PRF-32725, Fire Extinguishing Agent, F3 Liquid Concentrate, for Land-Based, Fresh Water Applications, on January 6, 2023. I certify that this MILSPEC is still valid and does not require revision. Since publishing the MILSPEC, DoD has qualified six F3 products and is continuing to review applications of additional products on a rolling basis. Qualified F3 agents conforming to the MILSPEC have been added to the Qualified Products List<sup>1</sup>, making them available for purchase. The Military Departments (MILDEPs) have begun to acquire MILSPEC-compliant F3 products and are working aggressively to remove AFFF from mobile assets and facilities, and to replace

<sup>1</sup> The Qualified Products List for qualified F3 agents (QPL-3272) can be found at:  
<https://qpldocs.dla.mil/search/parts.aspx?qpl=4513&param=&type=32768>

those AFFF stocks with F3 or other fluorine-free fire suppressant technologies. I certify that — despite the MILDEPs’ progress in advancing these tasks — F3 solutions that meet the military specification issued pursuant to subsection 322(a) are not yet available for all installations and equipment (including where such solutions may be incompatible with certain tactical assets), and the MILDEPs require additional time, beyond October 1, 2025, to procure, install, and/or modify systems to transition from AFFF worldwide, while maintaining mission readiness and safety standards.

To ensure a successful transition, the MILDEPs developed comprehensive AFFF replacement plans and are updating the plans quarterly. The transition schedules consider available resources, the number and location of each AFFF-using facility and asset, and the required system modifications needed for compatibility with the selected fire suppression system alternative. Additionally, the Department is evaluating the availability of other fluorine-free firefighting agents that can be used in certain tactical firefighting equipment currently incompatible with the available MILSPEC-qualified F3 agents.

Finally, I certify that, until AFFF is removed across all our military installations, DoD will continue measures to minimize the release of and exposure to AFFF. In accordance with the FY 2020 NDAA, the Department stopped purchasing AFFF for land-based applications as of October 2023. DoD does not currently use AFFF at our installations for firefighting training or testing unless the AFFF can be completely contained, captured, and properly disposed. If AFFF is released (e.g., for emergency response or an accidental release) on a military installation, installations implement existing spill response plans and procedures to contain and recover the AFFF and dispose of the AFFF in a manner that minimizes releases to the environment. The MILDEPs report all releases of AFFF above certain thresholds, as well as any completed or planned responsive actions, to the Office of the Secretary of Defense within 24 hours and to Congress, in accordance with section 318 of the NDAA for FY 2021.

As required by section 322, I will provide public notice of this waiver on DoD’s PFAS website at [www.defense.gov/PFAS](http://www.defense.gov/PFAS). The DoD is committed to eliminating AFFF use for firefighting operations across its installations and continues to prioritize transparency and work with all stakeholders as we address the PFAS challenge.

I am sending identical letters to the other congressional defense committees.

Sincerely,

Enclosure:  
As stated

cc:  
The Honorable Jack Reed  
Ranking Member



SECRETARY OF DEFENSE  
1000 DEFENSE PENTAGON  
WASHINGTON, DC 20301-1000

JUL 31 2025

The Honorable Mike D. Rogers  
Chairman  
Committee on Armed Services  
U.S. House of Representatives  
Washington, DC 20515

**CLEARED**  
**For Open Publication**

Aug 01, 2025

Department of Defense  
OFFICE OF PREPUBLICATION AND SECURITY REVIEW

Dear Mr. Chairman:

Section 322(c) of the National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2020 (Public Law 116-92) prohibits the Department from using fluorinated aqueous film-forming foam (AFFF) at any installation on or after: (1) October 1, 2024; or (2) the date on which the Secretary of Defense determines that compliance with the fluorinated AFFF prohibition is possible. Section 322(e) allows for two waivers of the prohibition for a period of one year each, subject to several conditions. The first one-year waiver was invoked on August 2, 2024, extending the deadline to October 1, 2025. I have determined that the second waiver of the prohibition with a statutory deadline of October 1, 2026 is necessary to sustain the operational availability of sufficient firefighting systems to ensure the protection of life and safety at Department of Defense (DoD) installations and during military operations. This letter provides the required 60 days advance notice to Congress, the necessary certification, and the information required by section 322(e) in support of the waiver.

I hereby certify that this one-year waiver of the prohibition on installation AFFF use is necessary for both installation infrastructure and mobile firefighting equipment. As discussed in the Government Accountability Office (GAO) report titled, "Firefighting Foam: DoD is Working to Address Challenges to Transitioning to per- and polyfluoroalkyl substances (PFAS)-Free Alternatives," GAO-24-107322 (July 8, 2024), replacing AFFF with fluorine-free foam (F3) or another technology (e.g., water-only systems) at approximately 1,000 facilities and over 6,000 mobile assets — all of which have to maintain firefighting capability during the transition — is complex, time-consuming, and supply-constrained. Although the Department has made significant progress in transitioning away from AFFF use, it needs additional time to ensure a methodical and safe transition of approximately 1,000 facilities and over 6,000 mobile assets. I thus certify that the second one-year section 322(e) waiver is necessary for the protection of life and safety.

As explained in the enclosed congressional briefing provided to you on May 23, 2025, over the past several years DoD has prioritized finding effective substitutes for AFFF. The Department published Military Specification (MILSPEC) MIL-PRF-32725, Fire Extinguishing Agent, F3 Liquid Concentrate, for Land-Based, Fresh Water Applications, on January 6, 2023. I certify that this MILSPEC is still valid and does not require revision. Since publishing the MILSPEC, DoD has qualified six F3 products and is continuing to review applications of additional products on a rolling basis. Qualified F3 agents conforming to the MILSPEC have been added to the Qualified Products List<sup>1</sup>, making them available for purchase. The Military Departments (MILDEPs) have begun to acquire MILSPEC-compliant F3 products and are working aggressively to remove AFFF from mobile assets and facilities, and to replace

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those AFFF stocks with F3 or other fluorine-free fire suppressant technologies. I certify that — despite the MILDEPs’ progress in advancing these tasks — F3 solutions that meet the military specification issued pursuant to subsection 322(a) are not yet available for all installations and equipment (including where such solutions may be incompatible with certain tactical assets), and the MILDEPs require additional time, beyond October 1, 2025, to procure, install, and/or modify systems to transition from AFFF worldwide, while maintaining mission readiness and safety standards.

To ensure a successful transition, the MILDEPs developed comprehensive AFFF replacement plans and are updating the plans quarterly. The transition schedules consider available resources, the number and location of each AFFF-using facility and asset, and the required system modifications needed for compatibility with the selected fire suppression system alternative. Additionally, the Department is evaluating the availability of other fluorine-free firefighting agents that can be used in certain tactical firefighting equipment currently incompatible with the available MILSPEC-qualified F3 agents.

Finally, I certify that, until AFFF is removed across all our military installations, DoD will continue measures to minimize the release of and exposure to AFFF. In accordance with the FY 2020 NDAA, the Department stopped purchasing AFFF for land-based applications as of October 2023. DoD does not currently use AFFF at our installations for firefighting training or testing unless the AFFF can be completely contained, captured, and properly disposed. If AFFF is released (e.g., for emergency response or an accidental release) on a military installation, installations implement existing spill response plans and procedures to contain and recover the AFFF and dispose of the AFFF in a manner that minimizes releases to the environment. The MILDEPs report all releases of AFFF above certain thresholds, as well as any completed or planned responsive actions, to the Office of the Secretary of Defense within 24 hours and to Congress, in accordance with section 318 of the NDAA for FY 2021.

As required by section 322, I will provide public notice of this waiver on DoD’s PFAS website at [www.defense.gov/PFAS](http://www.defense.gov/PFAS). The DoD is committed to eliminating AFFF use for firefighting operations across its installations and continues to prioritize transparency and work with all stakeholders as we address the PFAS challenge.

I am sending identical letters to the other congressional defense committees.

Sincerely,

A handwritten signature in black ink, appearing to be the initials 'PB' followed by a stylized flourish.

Enclosure:  
As stated

cc:  
The Honorable Adam Smith  
Ranking Member



SECRETARY OF DEFENSE  
1000 DEFENSE PENTAGON  
WASHINGTON, DC 20301-1000

JUL 31 2025

The Honorable Susan Collins  
Chair  
Committee on Appropriations  
United States Senate  
Washington, DC 20510

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Department of Defense  
OFFICE OF PREPUBLICATION AND SECURITY REVIEW

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Enclosure:  
As stated

cc:  
The Honorable Patty Murray  
Vice Chair



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WASHINGTON, DC 20301-1000

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Aug 01, 2025

Department of Defense  
OFFICE OF PREPUBLICATION AND SECURITY REVIEW

The Honorable Tom Cole  
Chairman  
Committee on Appropriations  
U.S. House of Representatives  
Washington, DC 20515

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The Honorable Rosa L. DeLauro  
Ranking Member