

Ref: FOI / 6325

29th April 2026

Freedom of Information Act 2000 Request - Firefighting Foam at CODA

I refer to your FOI request and respond as follows:

Q. In relation to City of Derry Airport and its use of firefighting foam on the site, please release any documentation relating to testing for PFOA contamination arising from foam use, the results of testing, remediation and any public health issues identified.

A. City of Derry Airport (CODA) maintains proactive engagement with the Northern Ireland Environment Agency (NIEA) regarding environmental compliance. This collaboration focuses on the implementation of Best Available Techniques and the management of emerging contaminants, such as Perfluorooctanoic Acid (PFOA). This alignment supports the NIEA's transition toward data-driven enforcement and heightened regulatory standards.

To ensure continuous oversight, the NIEA and Derry City & Strabane District Council (DC&SDC) conduct water sampling and 12-month monitoring programmes. Findings regarding emission performance and control measures are integrated into the Airport Safety management systems to ensure all follow-up actions meet statutory requirements. CODA acknowledges that failure to comply with these standards constitutes an offence subject to legal action, including formal cautions or prosecution.

In Northern Ireland, the NIEA regulates POPs under The Persistent Organic Pollutants Regulations 2007. While PFOA and related compounds were historically active ingredients in Class B Aqueous Film Forming Foams (AFFF), strict legal obligations now govern their use:

- Stockpiles exceeding 50kg must be reported to the NIEA.
- Use for training is strictly prohibited.

- Testing is permitted only under full containment.
- As of 4 July 2025, all use of such foams is prohibited.

CODA initiated the transition to fluorine-free foams in 2014 as part of a fire tender refurbishment programme. By 2022, all legacy foam stockpiles were removed from the site and decommissioned by approved contractors. A copy of the waste disposal certificate is attached.

Historically, CODA pre-emptively ceased the use of these foams for training and testing upon identifying potential contamination risks. Prior to their removal, all releases were captured within bunded areas, which continue to be professionally cleaned biannually by approved contractors to maintain environmental integrity.

The Environment Agency (EA) is currently intensifying its regulatory focus on Persistent Organic Pollutants (POPs). A comprehensive PFOA strategy is anticipated in 2026, introducing new interventions expected to be adopted in England and Scotland prior to being legislated in Northern Ireland. Concurrently, planned reforms by Defra and the EA aim to modernise waste exemptions by 2026. These changes will likely restrict the use of multiple exemptions on single sites and mandate more rigorous record-keeping. CODA remains committed to a proactive compliance strategy, ensuring all emerging recommendations and legislative requirements are integrated as they are announced.

If you are dissatisfied with our response, you have rights of review and appeal; these rights consist of two review processes.

Firstly, our internal review procedure is available by contacting:

John Kelpie
Chief Executive
Derry City and Strabane District Council
98 Strand Road
Derry BT48 7NN
Tel: 028 71253253 or email: john.kelpie@derrystrabane.com

Secondly, you can appeal directly by contacting the Information Commissioner at:

Information Commissioner

Wycliffe House

Water Lane

Wilmslow

CHESHIRE SK9 5AF

Tel: 0303 123 1113 (local rate) or email: casework@ico.org.uk

I would however advise that the Information Commissioner has indicated that a review will not be undertaken unless the Council has first had an opportunity to re-consider its decision.

Yours sincerely

Steve Frazer

Managing Director City of Derry Airport