GMCA GREATER MANCHESTER COMBINED AUTHORITY

Greater Manchester Combined Authority

Waste and Resources Committee

Date: 11 March 2026

Subject: The Impact of Government's Plan for the Management of Per- and Poly-Fluoroalkyl Substances (PFAS)

Report of: Paul Morgan, Head of Commercial Services, Waste and Resources Team

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Purpose of Report

This report is to give an early warning to the Committee on the future requirement to manage per- and poly-fluoroalkyl substances (PFAS – can also be referred to as PFOS) that may be contained in landfill leachate arising at GMCA's closed landfill sites.

Recommendations:

The Committee is requested to:

1. Note the report; and
2. Recognise the need to explore options and present them to a future Committee when more is understood.

Contact Officers

Name of key contact Officer and email address to be included

Paul Morgan, Head of Commercial Services, Waste and Resources Team

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Equalities Impact, Carbon and Sustainability Assessment:

Recommendation - Key points for decision-makers

The banning of PFAS discharges from wastewater treatment works pushes the treatment requirements 'upstream' to the point of creation. In this case the points of creation are GMCA's closed landfill sites. Therefore, GMCA will be required to develop proposals for the treatment of the leachate prior to discharge to sewer (as a leachate with PFAS chemicals removed). These proposals may result in the construction of infrastructures to treat the leachates at the closed landfill sites.

Impacts Questionnaire

Impact Indicator	Result	Justification/Mitigation
Equality and Inclusion		
Health		
Resilience and Adaptation	G	PFAS (or forever chemicals) chemicals are known to harm both human health and the environment. The government is banning the discharge of landfill leachates (e.g. to the sewerage system) so the arisings will need to be treated prior to discharge. The installation of pre-treatment infrastrucutre will remove PFAS chemicals from the leachate. It is likely that treatment infrastructure will be required at GMCA's closed landfill sites.
Housing		
Economy	G	Depending on the solution identified, there may be some economic benefit locally. Depending on the solution identified, there may be some employment benefit locally. Depending on the solution identified, there may be some benefit through experienced gained and knowledge transfer. Depending on the solution identified, there may be some benefit through knowledge transfer. Depending on the solution identified, there may be some benefit through gained experience and knowledge transfer. Depending on the solution identified, construction may be required.
Mobility and Connectivity		
Carbon, Nature and Environment	G	The removal of PFAS chemicals at a dedicated treatment plant will remove the discharge of the chemicals at wastewater treatment works.
Consumption and Production	R	The treatment of the PFAs chemicals is likely to result in residues that require disposal elsewhere. This aspect is unknown but will be considered in any future procurement. Construction of a waste mini station will be built into the procurement of any required treatment infrastructure.
Contribution to achieving the GM Carbon Neutral 2038 target		

Further Assessment(s): Carbon Assessment

G	**Positive impacts overall, whether long or short term.**	A	**Mix of positive and negative impacts. Trade-offs to consider.**	R	**Mostly negative, with at least one positive aspect. Trade-offs to consider.**	RR	**Negative impacts overall.**

Risk Management

Legal Considerations

New discharge limits for per- and poly-fluoroalkyl substances from wastewater treatment works are expected by April 2027. It is unclear on a timetable for action by managers of closed landfill sites, but it is likely that GMCA will need to introduce measures to be compliant with the relevant legislation.

Financial Consequences – Revenue

Expert consultancy advice may be required as a consequence of the publication of the PFAS Plan and its impacts of GMCA closed landfill sites. Additional sampling of leachates may be required. These costs will be covered by existing budgets.

Financial Consequences – Capital

At this stage a capital impact is not envisaged as a consequence of this report. Further updates will be provided to the Committee, and these may have capital requirements.

Number of attachments to the report: None

Comments/recommendations from Overview & Scrutiny Committee

N/A

Background Papers

- **PFAS Plan: building a safer future together - GOV.UK**

Tracking/ Process

Does this report relate to a major strategic decision, as set out in the GMCA Constitution?

No

Exemption from call in

Are there any aspects in this report which means it should be considered to be exempt from call in by the relevant Scrutiny Committee on the grounds of urgency?

No

Bee Network Committee

N/A

Overview and Scrutiny Committee

N/A

1. Introduction/Background

Per- and poly-fluoroalkyl substances (PFAS), are essential for many uses in our society. PFAS are valued for their resistance to heat, water and oil, and have been widely used across industries from firefighting foams and medical devices to textiles and packaging.

These chemicals are also often referred to as 'forever chemicals' as they are long-lasting and widespread in our environment yet are essential for many uses in our society.

In early February 2026 Defra published its PFAS Plan containing a long-term vision "…to work in partnership, taking a science-based and proportionate approach, to reduce and minimise the impacts of harmful PFAS on public health and the environment…". It will deliver this vision through three actions:

- understanding and identifying the sources of PFAS including where they originate from;
- accounting for the movement of PFAS around society and the environment, which means tackling PFAS pathways; and
- reducing and managing ongoing exposure to PFAS for people, animals and the environment.

Due to the widespread and historic use of PFAS chemicals they can be found in landfill leachates. These leachates are most often discharged to sewer following some pre-treatment (mainly to strip out methane). These leachates are treated at wastewater treatment works (WWTW) but PFAS is not removed by those processes, so they are ultimately discharged into the environment.

It is expected that new limits for the discharge of PFAS from WWTW will be introduced in April 2027 and those facilities will be unable to meet those new limits. As a consequence, many WWTWs are believed likely to refuse to accept PFAS-containing effluents (the current Trade Effluent Discharge Consent process regulates this) pushing the problem back to the source of the effluents – in this case landfill operators and/or owners.

This report summarises the potential impact on GMCA as the custodian of two closed landfill sites that do generate leachate that is likely to contain PFAS.

2. Implications for GMCA

GMCA manages two closed landfill sites:

- Bredbury, Stockport; and
- Waithlands, Rochdale.

In addition, GMCA manages 2 sites in the ownership of Manchester City Council under a service level agreement, located at:

- Barlow Hall, Chorlton; and
- Cringle Road, Levenshulme.

Bredbury, Barlow Hall and Cringle Road landfills discharge leachate to sewer under the terms of a Trade Effluent Discharge Consent (around 200,000 m^3 each year combined). Due to the age and nature of the Waithlands site leachate is not captured for treatment.

Although the situation is far from clear and, depending on United Utilities position, it may transpire that GMCA has to construct its own treatment facilities onsite (potentially one at each closed landfill with the accompanying planning applications, environmental permitting, design and procurement requirements) or a combination of treatment facilities and tankering (although the latter may be cost prohibitive).

The Service is also in discussion with GMFRS to see if there are any synergies in the treatment of PFAS-contaminated waters.

3. Next Steps for GMCA

Clearly there is a lot GMCA and the wider waste sector are yet to fully understand both at the national policy and legislator level and more locally. We are being kept informed on any developments through our network organisations, Suez and our technical advisers WSP. We are evolving an action plan to gain more understanding of the position and what our options are. These actions include:

- What are the likely timescales for implementation?
- Understanding the likely position of United Utilities:
    - Will it cease accepting landfill leachates?
    - If not, will there be an increase in discharge charges?
    - Will they refuse pushing the problem to us?

- What are the potential options for GMCA if it is required to treat the landfill leachate:
    - Suitable technologies;
    - Locations of treatment plants; and
    - Any alternatives to building our own infrastructure.
- Costs:
    - Construction of treatment facilities or alternatives will require considerable capital investment which needs quantifying as well as the potential revenue implications;
    - The alternative approach will be to capture leachate and tanker off- site for treatment which will have significant revenue costs; and
    - Impact on other waste streams and waste facility charges.
- Determining what other waste streams may fall under the PFOS requirements:

This is an emerging issue with potentially significant cost implications for GMCA. Further updates will be presented to the Committee as more information becomes available.