

New SOLAS requirement: prohibition of use or storage of firefighting media containing perfluorooctane sulfonic acid (PFOS)

The scope of the Marine Information Notice publication is to provide the Shipping Sector with information relevant to RINA, its organization, initiatives and services as well as to disseminate information of a general nature which in RINA view may be of interest. The information provided does not intend to be exhaustive and is given for reference only.

References

- ✓ Res. MSC.532(107) – SOLAS Chapter II-2
- ✓ Res. MSC.536(107) – 1994 HSC Code
- ✓ Res. MSC.537(107) – 2000 HSC Code
- ✓ IMO MSC.1/Circ.1694 – Unified interpretations of SOLAS Chapter II-2 and the HSC Codes (1994 and 2000).

Background

Resolution MSC.532(107) has introduced in SOLAS Chapter II-2 new restrictions for fire-extinguishing media containing perfluorooctane sulfonic acid (PFOS). Same requirements have been included also in High Speed Craft (HSC) Codes (1994 and 2000) by MSC.536(107) and MSC.537(107) respectively.

Annex I of EU Regulation 1257/2013 on Ship Recycling already imposed, only for ships flying the flag of EU Country, that new installations (as defined in Art. 3 (15) of the EU Regulation) containing (PFOS) and its derivatives were prohibited. EMSA Guidance on the Inventory of Hazardous Materials reports that the main application on board ships of material containing PFOS is firefighting foams of the type AFFF (Aqueous Film Forming Foams).

New Requirements

Starting from 1st January 2026, for ships constructed after such date, new SOLAS Regulation II-2/10.11.2.2 prohibits the use or storage of fire extinguishing media containing perfluorooctane sulfonic acid (PFOS).

For existing ships, constructed before 1 January 2026, such requirement is applicable not later than the date of the first annual, periodical or renewal survey, whichever occurs first, on or after 1 January 2026.

IMO MSC.1/Circ.1694 in paragraph 1 clarifies that the meaning of “extinguishing media” is to be intended to include firefighting foams, while in paragraph 2 is specified that the phrase of Regulation II-2/10.11.2.2 “*containing perfluorooctane sulfonic acid (PFOS)*” should mean present in concentrations of PFOS above 10 mg/kg (0.001% by weight).

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Required actions

Management Companies and Owners shall check if on board their ships fire extinguishing media containing PFOS are used or stored. If they are found on board, they shall be removed from the ship and disposed to appropriate shore-based reception facilities.

For the extinguishing media covered by the SOLAS Convention, maker's declaration or laboratory test reports shall be provided by shipyards, repair yards and equipment makers.

The declaration issued by the foam maker should contain information about the foam such as, but not limited to: foam type, production period, batch number, reference to type approval/Marine Equipment Directive (MED) Certificate for the foam.

For extinguishing media installed before 1 January 2026, where the maker's declaration or laboratory test reports are not available, sampling and testing of the extinguishing media on board should be required to be conducted in accordance with a recognized standard.

Administrations, or ROs duly authorized, shall verify, by reviewing the above mentioned documentation, that extinguishing media containing perfluorooctane sulfonic acid (PFOS) are not used or stored on ships.

Services provided by RINA

By the first survey on or after 1 January 2026 RINA surveyors, when authorized by the Flag Administration, will verify:

- that no extinguishing media containing PFOS are used or stored on board,
- evidence of removal and disposal to dedicated facilities has been carried out together with the replacement with equipment documented PFOS-free.

Attachments

- ✓ Extract of MSC.532(107) relevant to amendments to SOLAS Ch II-2
- ✓ Res. MSC.536(107) Amendments to 1994 HSC Code
- ✓ Res. MSC.537(107) – Amendments to 2000 HSC Code
- ✓ IMO MSC.1/Circ.1694 – Unified interpretations of SOLAS Chapter II-2 and the HSC Codes (1994 and 2000).