

ABS REGULATORY NEWS

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PROHIBITION OF FIRE-FIGHTING FOAMS CONTAINING PFOS ONBOARD SHIPS

This Regulatory News provides an update and guidance on the latest developments regarding the prohibition of use or storage of extinguishing media containing perfluorooctane sulfonic acid (PFOS) on board ships.

BACKGROUND

The Maritime Safety Committee adopted amendments to SOLAS Chapter II-2/Reg. 10.11 (resolution MSC.532(107)) and the 1994 and 2000 HSC Codes (resolutions MSC.536(107) and MSC.537(107)), prohibiting the use and storage of fire-fighting foams containing PFOS (perfluorooctane sulfonic acid) on ships. PFOS is recognized as hazardous to human health and marine life. These amendments aim to protect individuals on board from harmful substances and reduce environmental impact. The prohibition applies to both fixed and portable fire-fighting systems.

The IMO received proposals to replace the term PFOS with PFAS (fluorinated substances containing at least one fully fluorinated methyl or methylene carbon atom) in the amendments. This change would enable a complete ban on all fluorine-containing PFAS chemicals. However, it was decided that a ban on fluorinated substances in foam concentrates is not necessary at this time. The issue will be revisited if there is a need to expand the ban to include other fluorinated foam concentrates.

APPLICATION

The amendments will enter into force on January 1, 2026, prohibiting the use and storage of fire-extinguishing media containing PFOS on both new and existing ships and craft.

New ships

Ships and craft constructed on or after January 1, 2026, are to comply with the new requirements at the time of delivery. The expression 'constructed' means keel laying or a similar stage of construction.

Existing ships

Existing ships and craft shall comply with the new requirements at the time of the "first survey" on/or after January 1, 2026. The term "first survey" refers to whichever is due first: annual, periodical, or renewal survey for the cargo ship safety equipment certificate, cargo ship safety certificate, passenger ship safety certificate, or high-speed craft safety certificate. Provided that the fire-fighting media is found to be compliant with the new requirements at the time of the survey, there is no need to re-issue the relevant certificate.

KEY NOTES

Application:

- New and Existing Ships on or after January 1, 2026

References:

- MSC.532(107) including amendments to SOLAS Chapter II-2, Part C, Regulation 10 – Fire-Fighting
- MSC.536 (107) & MSC.537(107) including amendments to High-Speed Craft Codes (HSC) Chapter 7 Part A, Regulation 7.9

DRAFT UNIFIED INTERPRETATION OF SOLAS REGULATION II-2/10.11 REGARDING EXTINGUISHING MEDIA CONTAINING PFOS

The IMO Sub-Committee on the Ship Systems and Equipment (SSE), during its 11th session in February 2025, agreed to the draft MSC circular on the unified interpretations for SOLAS regulation II-2/10.11.2.2 and regulation 7.9.4 of the 1994 and 2000 HSC Codes, containing the following provisions:

- The phrase "fire-extinguishing media" should include fire-fighting foams.
- The phrase "containing perfluorooctane sulfonic acid (PFOS)" should mean present in concentrations of PFOS above 10 mg/kg (0.001 percent by weight).
- Verification that "extinguishing media containing PFOS" are not used or stored on ships, should require the Administration or its recognized organization (RO) to review the maker's declaration or laboratory test reports for the extinguishing media covered by the SOLAS Convention.
- The declaration issued by the foam maker should contain information about the foam, such as, but not limited to foam type, production period, batch No., reference to type approval/MED Certificate for the foam.
- For extinguishing media installed before January 1, 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.

The draft unified interpretation will be submitted to MSC 110 (June 2025) for approval, with an anticipated effective date of January 1, 2026.



ACTIONS FOR COMPLIANCE

- Shipowners, Operators, and Masters need to be aware of the prohibition on the use or storage of fire-extinguishing media containing PFOS. They should also ensure obtaining the manufacturer's declaration or a laboratory test report confirming that the foam concentrate complies with the new requirements in a timely manner. In case fire-fighting media containing PFOS are onboard, timely action must be taken to remove or replace them before January 1, 2026.
- When PFOS is removed from a ship, it should be delivered to appropriate shore-based reception facilities. It is recommended that this removal and subsequent delivery be duly recorded in the ship's official logbook.
- Replacement extinguishing media must be approved and certified in accordance with the applicable IMO guidelines. The approval certificate for the extinguishing media should clearly indicate that it does not contain PFOS. High-expansion foam concentrate should comply with the *Guidelines for The Performance and Testing Criteria and Surveys of High-Expansion Foam Concentrates for Fixed Fire-*

Extinguishing Systems (MSC/Circ.670), while low-expansion foam should adhere to the Revised Guidelines for the Performance and Testing Criteria, and Surveys of Foam Concentrates for Fixed Fire-Extinguishing Systems (MSC.1/Circ.1312).

REFERENCES

Document	Title
MSC.532(107)	Amendments to the International Convention for the Safety of Life At Sea, 1974 SOLAS Chapter II-2, Part C, Regulation 10 – Fire-Fighting
MSC.536(107)	Amendments to the International Code of Safety for High-Speed Craft, 1994 High-Speed Craft Code (HSC) Chapter 7 Part A, Regulation 7.9
MSC.537(107)	Amendments to the International Code of Safety for High-Speed Craft, 2000 High-Speed Craft Code (HSC) Chapter 7 Part A, Regulation 7.9
MSC 110/14	Report of the eleventh session of the Sub-Committee
MSC/Circular.670	Guidelines for The Performance and Testing Criteria and Surveys of High-Expansion Foam Concentrates for Fixed Fire-Extinguishing Systems
MSC.1/Circ.1312	Revised Guidelines for the Performance and Testing Criteria, and Surveys of Foam Concentrates for Fixed Fire-Extinguishing Systems

WORLD HEADQUARTERS

1701 City Plaza Drive | Spring, TX 77389 USA

P 1-281-877-6000 | F 1-281-877-5976

ABS-WorldHQ@eagle.org

www.eagle.org

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