

ANNEX 1

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

SOLAS regulation II-2/10.11.2.2 reads, as follows:

"11.2.2 Use or storage of extinguishing media containing perfluorooctane sulfonic acid (PFOS) shall be prohibited."

SOLAS regulation II-2/1.2.10 as amended by resolution MSC.532(107) reads as follows:

"2.10 All ships constructed before 1 January 2026 shall comply with regulation 10.11.2, as adopted by resolution MSC.532(107), not later than the date of the first survey* on or after 1 January 2026.

* Refer to the *Unified interpretation of the term 'first survey' referred to in SOLAS regulations (MSC.1/Circ.1290)*."

Interpretation

- 1 The phrase "fire-extinguishing media" should include the firefighting foams.
- 2 The phrase "containing perfluorooctane sulfonic acid (PFOS)" should mean present in concentrations of PFOS above 10 mg/kg (0.001% by weight).
- 3 Verification that "extinguishing media containing perfluorooctane sulfonic acid (PFOS)" are not used or stored on ships, should require the Administration or its recognized organization to review the maker's declaration or laboratory test reports for the extinguishing media covered by the SOLAS Convention, which should be provided to the Administration or to its recognized organization by shipyards, repair yards and equipment makers.
- 4 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., ref. to type approval / MED Certificate for the foam.
- 5 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.

ANNEX 2

DRAFT UNIFIED INTERPRETATION OF REGULATION 7.9.4 OF THE 1994 AND 2000 HSC CODES RELATED TO THE IMPLEMENTATION OF THE FIRE-EXTINGUISHING MEDIA RESTRICTIONS

Regulation 7.9.4 of the 1994 HSC Code reads as follows:

"7.9.4 Fire-extinguishing media restrictions

7.9.4.1 The following restrictions should apply for the use, storage or disposal of perfluorooctane sulfonic acid (PFOS):

- .1 on all craft, use or storage of extinguishing media containing perfluorooctane sulfonic acid (PFOS) should be prohibited no later than the date of the first survey* on or after 1 January 2026; and
- .2 the substances prohibited by the requirements of 7.9.4.1.1 should be delivered to appropriate shore-based reception facilities when removed from the craft.

* Refer to the *Unified interpretation of the term 'first survey' referred to in SOLAS regulations (MSC.1/Circ.1290)*."

Regulation 7.9.4 of the 2000 HSC Code reads as follows:

"7.9.4 Fire-extinguishing media restrictions

7.9.4.1 The following restrictions shall apply for the use, storage or disposal of perfluorooctane sulfonic acid (PFOS):

- .1 on craft constructed on or after 1 January 2026, use or storage of extinguishing media containing perfluorooctane sulfonic acid (PFOS) shall be prohibited;
- .2 craft constructed before 1 January 2026 shall comply with the requirements of 7.9.4.1.1 no later than the date of the first survey* on or after 1 January 2026; and
- .3 the substances prohibited by the requirements of 7.9.4.1.1 or 7.9.4.1.2 shall be delivered to appropriate shore-based reception facilities when removed from the craft.

* Refer to the *Unified interpretation of the term 'first survey' referred to in SOLAS regulations (MSC.1/Circ.1290)*."

Interpretation

1 The phrase "fire-extinguishing media" should include firefighting foams.

2 The phrase "containing perfluorooctane sulfonic acid (PFOS)" should mean present in concentrations of PFOS above 10 mg/kg (0.001% by weight).

3 Verification that "extinguishing media containing perfluorooctane sulfonic acid (PFOS)" are not used or stored on ships, should require the Administration or its recognized organization to review the maker's declaration or laboratory test reports for the extinguishing media covered by the SOLAS Convention, which should be provided to the Administration or its recognized organization by shipyards, repair yards and equipment makers.

4 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., ref. to type approval / MED Certificate for the foam.

5 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.
