



TECHNICAL CIRCULAR No. 883 of 7th July 2025

To	All Surveyors/Auditors. All flags
Title	Unified Interpretation: Extinguishing Media Containing PFOS
Reference	MSC 107 to SOLAS

Unified Interpretation Relating to the Extinguishing Media Containing PFOS

The amendments adopted by MSC 107 to SOLAS and the 1994 and 2000 High-Speed Craft (HSC) Codes prohibiting of the use and storage of fire-extinguishing media containing perfluorooctane sulfonic acid (PFOS) do not specifically state how compliance with the requirements to prohibit PFOS will be demonstrated for new and existing ships.

The draft UIs propose interpretations for SOLAS regulation II-2/10.11.2.2 and regulation 7.9.4 of the 1994 and 2000 HSC Codes to provide specific terminology and detail the minimum requirements to achieve compliance.

Both interpretations clarify:

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

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REFERENCES:

-Amendments adopted by MSC 107 to SOLAS and the 1994 and 2000 High-Speed Craft (HSC) Codes

ATTACHMENTS: No

Kindest Regards,
CONARINA Technical Office

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