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Prohibition of use of PFOS in fire extinguishing media on board ships

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Notification to: Ship Owners/ Managers/ Operators / Surveyors/ Auditors

Overview

Fire extinguishing media containing perfluorooctane sulfonic acid (**PFOS**) cannot be used or stored on board ships due to significant amendments by the IMO to the SOLAS Chapter II-2 and to the High-Speed Craft (HSC) Codes. According to the IMO Resolutions **MSC.532(107)**, **MSC.536(107)** and **MSC.537(107)**, this prohibition is set to take effect on **January 1, 2026**.

Scope of the Regulation and Implementation Timeline

All fire extinguishing media, including firefighting foams, are prohibited as are both fixed and portable firefighting systems and equipment. The regulation is applicable to:

- **New ships** (keel laid on or after January 1, 2026) must comply **at delivery**.
- **Existing ships** (built before January 1, 2026) must comply **by the first survey on or after January 1, 2026**.

Compliance Actions

To ensure timely compliance, the following actions are recommended:

- **Immediate evaluation of Firefighting Media**

- Start examining onboard inventories of all fire extinguishing media, including fixed and portable systems, and assess compliance with the new requirements.
- Confirm that a manufacturer's declaration or laboratory test report is available, verifying that the foam concentrate meets IMO requirements.
- The type of foam, production time, batch number, and a reference to the type approval or MED certificate should all be included in the declaration.
- **Interact with Suppliers**
 - If reports are unavailable, consult suppliers to obtain documentation or arrange testing.
- **Removal or Replacement of Non-Compliant Media**
 - Remove or replace any fire-extinguishing media containing PFOS above 10 mg/kg (10 ppm).
 - Replacement media must be approved and certified according to IMO guidelines, clearly indicating they do not contain PFOS.
- **Disposal of Removed Media**
 - Deliver removed media to appropriate shore-based reception facilities.
 - Record the removal and disposal in the official logbook of the ship.
- **Testing Requirements**
 - For media installed before January 1, 2026 without declarations or reports, sampling and testing should be conducted in accordance with accepted standards.
- **Training and Awareness**
 - Educate crew members and relevant personnel about the new regulations.
 - Include updated procedures in fire drills and emergency exercises to ensure proper use of replacement media.
- **Verification by Flag or Recognized Organization (RO)**
 - Request the ship's flag administration or RO to review the manufacturer's declaration or test reports.
 - Confirm that PFOS-containing media are not used or stored onboard.

Future Outlook

The European Union, IMO, and other regulatory authorities are anticipated to adopt further measures aimed at restricting the use of environmentally hazardous substances in fire extinguishing media.

Act now

Shipowners and operators are strongly encouraged to take proactive measures to ensure compliance with the forthcoming prohibition on PFOS containing fire extinguishing media, effective January 1, 2026.

Early implementation will reflect a commitment to environmental responsibility and facilitate continued alignment with evolving IMO and EU regulatory requirements. Timely action will also mitigate the risk of detention during Port State Control inspections and prevent potential operational disruptions.