



JAPAN P&I NEWS

外航組員各位

ペルフルオロオクタンスルホン酸（**PFOS**）を含有する消火剤の使用禁止に伴う対応について

一般財団法人日本海事協会（Class NK）から、ペルフルオロオクタンスルホン酸（以下、PFOS）を含有する消火剤の使用禁止に伴う対応について情報を入手いたしましたので、以下のとおりご案内します。

2023 年 5 月に開催された第 107 回海上安全委員会（MSC 107）において、PFOS を含有する消火剤の使用および搭載を禁止する SOLAS II-2 章の改正（決議 MSC.532(107)）が採択されました。さらに、2025 年 6 月の MSC 110 において、PFOS を含有していないことをメーカーの宣言書または試験所の試験報告書で確認することを定めた統一解釈 MSC.1/Circ.1694 が採択されました。

この改正は 2026 年 1 月 1 日に発効します。以降は、PFOS を含有（10 mg/kg (重量当たり 0.001%) を超える濃度を指す）する消火剤の使用および搭載は禁止となります。泡消火剤が PFOS を含有していないことを確認するために、船上には以下のいずれかの書類を保管する必要があります。

1. メーカーの宣言書
2. 試験所の試験報告書

上記がない場合は、船上でのサンプリングおよび試験が必要です。

対象は国際航海に従事する船舶です。新造船は製造中登録検査で、既存船は 2026 年 1 月 1 日以降最初の安全設備検査で、上記の書類について確認されます。また、就航後に泡消火剤を交換・新たに搭載する場合も、定期的検査にて確認されます。

詳細については、添付の ClassNK テクニカルインフォメーションをご参照ください。

以上

添付資料：ClassNK テクニカルインフォメーション No. TEC-1362

標題

ペルフルオロオクタンスルホン酸(PFOS)を含有する消火剤の使用禁止に伴う対応について

ClassNK

テクニカル インフォメーション

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各位

2023 年 5 月に開催された第 107 回海上安全委員会(MSC 107)において、PFOS を含有する消火剤の使用及び搭載を禁止する SOLAS II-2 章の改正が決議 MSC.532(107)として採択されました。また、2025 年 6 月に開催された MSC 110 において、PFOS を含有していないことをメーカーの宣言書又は試験所の試験報告書によって確認することなどを定めた統一解釈 MSC.1/Circ.1694 が採択されました。

SOLAS 改正は 2026 年 1 月 1 日に発効されることから、準備が必要な事項などについてお知らせいたします。

1. 概要

2026 年 1 月 1 日以降、PFOS を含有する消火剤の使用及び搭載が禁止となります。

「PFOS を含有」とは、10mg/kg（重量当たり 0.001%）を超える濃度で PFOS が存在することを意味します。

泡消火剤が PFOS を含有していないことを確認するために、以下のいずれかの書類を船上に保管する必要があります。

(1) メーカーの宣言書

(2) 試験所の試験報告書

(1)又は(2)の書類がない場合は、以下を実施する必要があります。

(3) 船上でのサンプリング及び試験

2. 対象船舶

国際航海に従事する船舶（内航船につきましては船籍国政府の指示に従うこととなります）。

3. 検査

(1) 新造船（起工日が 2026 年 1 月 1 日以降）

製造中登録検査において、メーカーの宣言書もしくは試験所の試験報告書を確認します。

(2) 現存船（起工日が 2026 年 1 月 1 日より前）

2026 年 1 月 1 日以降の最初の安全設備検査（臨時検査を除く）において、メーカーの宣言書もしくは試験所の試験報告書を確認します。なお、これらの書類がない場合は船上でのサンプリング及び試験を実施する必要があります。

2026 年 1 月 1 日以降に完工する船舶に対しては、製造中登録検査において書類を確認します。

（次頁に続く）

NOTES:

- ClassNK テクニカルインフォメーションは、あくまで最新情報の提供のみを目的として発行しています。
- ClassNK 及びその役員、職員、代理もしくは委託事業者のいずれも、掲載情報の正確性及びその情報の利用あるいは依存により発生する、いかなる損失及び費用についても責任は負いかねます。
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(3) 就航後、泡消火剤を交換又は新たに搭載する場合

2026 年 1 月 1 日以降、船級の定期的検査において、メーカーの宣言書もしくは試験所の試験報告書を確認します。

4. メーカーの宣言書

メーカーの宣言書には、例えば泡原液の型式、生産時期、バッチ番号、泡原液の型式承認/MED 承認の識別番号などの泡原液に関する情報を含める必要があります。ただし、これらに限定するものではありません。

5. 船上でのサンプリング及び試験

2026 年 1 月 1 日より前に搭載された泡消火剤については、メーカーの宣言書又は試験所の試験報告書がない場合、弊会が適当と認める要領に従って、船上でサンプリング及び試験を実施する必要があります。弊会が適当と認める要領とは、例えば、EMSA Guidance on the Inventory of Hazardous Materials Annex C C.a.4 Sampling and analysis of PFOS に記載された要領をいいます。また、EMSA Guidance では、ISO 17025 もしくはこれと同等の規格に準拠した試験所における試験の実施が規定されております。EMSA Guidance は以下のウェブサイトよりご参照できます。

URL: <https://emsa.europa.eu/about/financial-regulations/items.html?cid=280&id=3003>

なお、本件に関してご不明な点は、以下の部署にお問い合わせください。

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添付:

1. Resolution MSC.532(107)
2. MSC.1/Circ. 1694

ANNEX 2

**RESOLUTION MSC.532(107)
(adopted on 8 June 2023)**

**AMENDMENTS TO THE INTERNATIONAL CONVENTION FOR THE
SAFETY OF LIFE AT SEA, 1974**

THE MARITIME SAFETY COMMITTEE,

RECALLING Article 28(b) of the Convention on the International Maritime Organization concerning the functions of the Committee,

RECALLING ALSO article VIII(b) of the International Convention for the Safety of Life at Sea, 1974 ("the Convention"), concerning the amendment procedure applicable to the annex to the Convention, other than to the provisions of chapter I,

HAVING CONSIDERED, at its 107th session, amendments to the Convention proposed and circulated in accordance with article VIII(b)(i) of the Convention,

1 ADOPTS, in accordance with article VIII(b)(iv) of the Convention, amendments to the Convention, the text of which is set out in the annex to the present resolution;

2 DETERMINES, in accordance with article VIII(b)(vi)(2)(bb) of the Convention, that the said amendments shall be deemed to have been accepted on 1 July 2025, unless, prior to that date, more than one third of the Contracting Governments to the Convention or Contracting Governments the combined merchant fleets of which constitute not less than 50% of the gross tonnage of the world's merchant fleet have notified the Secretary-General of their objections to the amendments;

3 INVITES Contracting Governments to the Convention to note that, in accordance with article VIII(b)(vii)(2) of the Convention, the amendments shall enter into force on 1 January 2026 upon their acceptance in accordance with paragraph 2 above;

4 REQUESTS the Secretary-General, for the purposes of article VIII(b)(v) of the Convention, to transmit certified copies of the present resolution and the text of the amendments contained in the annex to all Contracting Governments to the Convention;

5 ALSO REQUESTS the Secretary-General to transmit copies of this resolution and its annex to Members of the Organization which are not Contracting Governments to the Convention.

ANNEX

AMENDMENTS TO THE INTERNATIONAL CONVENTION FOR THE
SAFETY OF LIFE AT SEA, 1974

CHAPTER II-1
CONSTRUCTION – STRUCTURE, SUBDIVISION AND STABILITY,
MACHINERY AND ELECTRICAL INSTALLATIONS

Part A
General

Regulation 2

Definitions

1 The following new paragraphs are added after existing paragraph 29:

"30 *Lifting appliance* means any load-handling ship's equipment:

- .1 used for cargo loading, transfer or discharge;
- .2 used for raising and lowering hold hatch covers or movable bulkheads;
- .3 used as engine-room cranes;
- .4 used as stores cranes;
- .5 used as hose handling cranes;
- .6 used for launch and recovery of tender boats and similar applications;
and
- .7 used as personnel handling cranes.

31 *Anchor handling winch* means any winch for the purpose of deploying, recovering and repositioning anchors and mooring lines in subsea operations.

32 *Loose gear* means an article of ships equipment by means of which a load can be attached to a lifting appliance or an anchor handling winch but which does not form an integral part of the appliance or load.

33 The expression *installed on or after 1 January 2026*, as provided in regulation 3-13, means:

- .1 for ships the keel of which is laid or which is at a similar stage of construction on or after 1 January 2026, any installation date on the ship; or
- .2 for ships other than those specified in .1, including those constructed before 1 January 2009, a contractual delivery date for lifting appliance or anchor handling winches, or in the absence of a contractual delivery date, the actual delivery date of the lifting appliance or anchor handling winches to the ship on or after 1 January 2026."

Part A-1

Structure of ships

2 The following new regulation is added after existing regulation II-1/3-12, together with the associated footnotes:

"Regulation 3-13

Lifting appliances and anchor handling winches

1 Application

1.1 Unless expressly provided otherwise, this regulation shall apply to lifting appliances and anchor handling winches, and loose gear utilized with the lifting appliances and the anchor handling winches.

1.2 Notwithstanding the above, this regulation does not apply to:

- .1 lifting appliances on ships certified as MODUs;¹
- .2 lifting appliances used on offshore construction ships, such as pipe/cable laying/repair or offshore installation vessels, including ships for decommissioning work, which comply with standards acceptable to the Administration;
- .3 integrated mechanical equipment for opening and closing hold hatch covers; and
- .4 life-saving launching appliances complying with the International Life-Saving Appliance (LSA) Code.

1.3 The Administration shall determine to what extent the provisions of paragraphs 2.1 and 2.4 do not apply to lifting appliances which have a safe working load below 1,000 kg.

2 Design, construction and installation

2.1 Lifting appliances installed on or after 1 January 2026 shall be:

- .1 designed, constructed and installed in accordance with the requirements of a classification society which is recognized by the Administration in accordance with the provisions of regulation XI-1/1 or standards acceptable to the Administration which provide an equivalent level of safety; and
- .2 load tested and thoroughly examined after installation and before being taken into use for the first time and after repairs, modifications or alterations of major character.

2.2 Anchor handling winches installed on or after 1 January 2026 shall be designed, constructed, installed and tested to the satisfaction of the Administration, based on the Guidelines developed by the Organization.²

2.3 Lifting appliances installed on or after 1 January 2026 shall be permanently marked and provided with documentary evidence for the safe working load (SWL).

2.4 Lifting appliances installed before 1 January 2026 shall be tested and thoroughly examined, based on the Guidelines developed by the Organization³ and comply with paragraph 2.3 no later than the date of the first renewal survey on or after 1 January 2026.

2.5 Anchor handling winches installed before 1 January 2026 shall be tested and thoroughly examined, based on the Guidelines developed by the Organization² no later than the date of the first renewal survey on or after 1 January 2026.

3 Maintenance, operation, inspection and testing

All lifting appliances and anchor handling winches, regardless of installation date, and all loose gear utilized with any lifting appliances and anchor handling winches, shall be operationally tested, thoroughly examined, inspected, operated and maintained, based on the Guidelines developed by the Organization.^{2,3}

4 Inoperative lifting appliances and anchor handling winches

Except as provided in regulation I/11(c), while all reasonable steps shall be taken to maintain lifting appliances, anchor handling winches and loose gear to which this regulation applies in working order, malfunctions of that equipment shall not be assumed as making the ship unseaworthy or as a reason for delaying the ship in ports, provided that action has been taken by the master to take the inoperative lifting appliance or anchor handling winch into account in planning and executing a safe voyage.^{2, 3}

¹ Ships certified as MODUs are those subject to the MODU Code and which carry a MODU Code Certificate on board issued by the Administration or a recognized organization. The carriage of this certificate includes authorized electronic versions available on board.

² Refer to the *Guidelines for anchor handling winches* (MSC.1/Circ.1662).

³ Refer to the *Guidelines for lifting appliances* (MSC.1/Circ.1663)."

CHAPTER II-2 CONSTRUCTION – FIRE PROTECTION, FIRE DETECTION AND FIRE EXTINCTION

Part A General

Regulation 1 Application

2 Applicable requirements to existing ships

3 The following new paragraph 2.10 is added after existing paragraph 2.9, together with the associated footnote:

"2.10 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)."

Part C

Suppression of fire

Regulation 10

Fire fighting

4 The following new paragraph 11 is added after existing section 10:

"11 Fire-extinguishing media restrictions

The purpose of this paragraph is to protect persons on board against exposure to dangerous substances used in fire fighting, as well as to minimize the impact of fire-extinguishing media that are deemed detrimental to the environment.

11.1 Application

This regulation applies to ships constructed on or after 1 January 2026.

11.2 General

11.2.1 The prohibited substances in this regulation shall be delivered to appropriate shore-based reception facilities when removed from the ship.

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

CHAPTER V

SAFETY OF NAVIGATION

Regulation 2

Definitions

5 The following new paragraphs are added after existing paragraph 7, together with the associated footnotes:

"8 *Bulk carrier* means a bulk carrier as defined in regulation XII/1.1.¹

9 *Containership* means a ship which is intended primarily to carry containers.²

1 Refer to *Clarification of the term "bulk carrier" and guidance for application of regulations in SOLAS to ships which occasionally carry dry cargoes in bulk and are not determined as bulk carriers in accordance with regulation XII/1.1 and chapter II-1* (resolution MSC.277(85)).

2 Refer to the term "container" as defined in article II of the International Convention for Safe Containers (CSC), 1972."

Regulation 18

Approval, surveys and performance standards of navigational systems and equipment and voyage data recorder

6 The following reference is added to the footnote corresponding to paragraph 2:

"*Performance standards for electronic inclinometers* (resolution MSC.363(92))"

Regulation 19

Carriage requirements for shipborne navigational systems and equipment

7 The following new paragraph 2.12 is added after existing paragraph 2.11:

"2.12 Containerships and bulk carriers of 3,000 gross tonnage and upwards constructed on or after 1 January 2026 shall be fitted with an electronic inclinometer, or other means, to determine, display and record the ship's roll motion."

CHAPTER XIV SAFETY MEASURES FOR SHIPS OPERATING IN POLAR WATERS

Regulation 2

Application

8 Regulation 2 is replaced by the following:

"Regulation 2

Application

1 Unless expressly provided otherwise, this chapter applies to the following ships operating in polar waters:¹

- .1 ships certified in accordance with chapter I;
- .2 fishing vessels of 24 metres in length overall and above;
- .3 pleasure yachts of 300 gross tonnage and upwards not engaged in trade; and
- .4 cargo ships of 300 gross tonnage and upwards but below 500 gross tonnage.

¹ Refer to the *Interim safety measures for ships not certified under the SOLAS Convention operating in polar waters* (resolution A.1137(31)).

2 Ships subject to paragraph 1.1 constructed before 1 January 2017 shall meet the relevant requirements of the Polar Code by the first intermediate or renewal survey, whichever occurs first, after 1 January 2018.

3 Ships subject to paragraphs 1.2, 1.3 or 1.4 constructed before 1 January 2026 shall meet the relevant requirements of chapters 9-1 and 11-1 in part I-A of the Polar Code by 1 January 2027.

4 In applying part I-A of the Polar Code, consideration should be given to the additional guidance in part I-B of the Polar Code.

5 This chapter shall not apply to ships owned or operated by a Contracting Government and used, for the time being, only in government non-commercial service. However, ships owned or operated by a Contracting Government and used, for the time being, only in government non-commercial service are encouraged to act in a manner consistent, so far as reasonable and practicable, with this chapter.

6 Nothing in this chapter shall prejudice the rights or obligations of States under international law."

Regulation 3

Requirements for ships to which this chapter applies

9 Regulation 3 is replaced by the following:

"Regulation 3

Requirements for ships certified in accordance with chapter I

1 Ships subject to regulation 2.1.1 above shall comply with the requirements of the safety-related provision of the introduction and with part I-A of the Polar Code and shall, in addition to the requirements of regulations I/7, I/8, I/9 and I/10, as applicable, be surveyed and certified, as provided for in that Code.

2 Ships subject to regulation 2.1.1 above holding a certificate issued pursuant to the provisions of paragraph 1 shall be subject to the control established in regulations I/19 and XI-1/4. For this purpose, such certificates shall be treated as a certificate issued under regulation I/12 or I/13."

10 The following new regulation is inserted after existing regulation 3:

"Regulation 3-1

Requirements for fishing vessels of 24 metres in length overall and above, pleasure yachts of 300 gross tonnage and upwards not engaged in trade and cargo ships of 300 gross tonnage and upwards but below 500 gross tonnage

1 Ships subject to regulations 2.1.2, 2.1.3 or 2.1.4 on all voyages in the Antarctic area and voyages in Arctic waters beyond the outer limit of the territorial sea of the Contracting Government whose flag the ship is entitled to fly shall comply with the provisions of chapters 9-1 and 11-1 of part I-A of the Polar Code, taking into account the introduction and the safety-related provisions of paragraphs 1.2, 1.4 and 1.5 of chapter 1 of part I-A of the Polar Code.

2 Notwithstanding paragraph 1 above, the Administration shall determine to what extent the provisions of regulations 9-1.3.1 and 9-1.3.2 of chapter 9-1 of part I-A of the Polar Code do not apply to:

- .1 fishing vessels of 24 metres in length overall and above; and
- .2 ships of 300 gross tonnage and upwards but below 500 gross tonnage not engaged in international voyages."

APPENDIX

CERTIFICATES

Record of equipment for passenger ship safety (Form P)

2 Details of life-saving appliances

11 In the table for "Details of life-saving appliances", entries 10 to 10.2 are replaced by the following:

10	Number of immersion suits
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Form of Safety Equipment Certificate for Cargo Ships

Cargo Ship Safety Equipment Certificate

Type of ship

12 The following new entry is added after "Gas carrier":

"Containership"

Record of equipment for cargo ship safety (Form E)

2 Details of life-saving appliances

13 In the table for "Details of life-saving appliances", entries 9 to 9.2 are replaced by the following:

9	Number of immersion suits
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3 Details of navigational systems and equipment

14 In the table for "Details of navigational systems and equipment", the following new entry is added after existing entry 15 (Bridge navigational watch alarm system (BNWAS)):

"16 Electronic inclinometer"

Form of Safety Certificate for Nuclear Cargo Ships

Nuclear Cargo Ship Safety Certificate

Type of Ship

15 The following new entry is added after "Gas carrier":

"Containership"

Record of equipment for cargo ship safety (Form C)

2 Details of life-saving appliances

16 In the table for "Details of life-saving appliances", entries 9 to 9.2 are replaced by the following:

9	Number of immersion suits
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5 Details of navigational systems and equipment

17 In the table for "Details of navigational systems and equipment", the following new entry is added after existing entry 15 (Bridge navigational watch alarm system (BNWAS)):

"16 Electronic inclinometer"



E

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MSC.1/Circ.1694
4 July 2025

**UNIFIED INTERPRETATIONS OF SOLAS CHAPTER II-2,
AND THE 1994 AND 2000 HSC CODES**

1 The Maritime Safety Committee, at its 110th session (18 to 27 June 2025), approved the *Unified interpretations of SOLAS chapter II-2, and the 1994 and 2000 HSC Codes*, prepared by the Sub-Committee on Ship Systems and Equipment, at its eleventh session (24 to 28 February 2025), in order to provide the necessary clarity on how compliance with the requirements to prohibit PFOS will be demonstrated for both new and existing ships, as set out in the annex.

2 Member States are invited to use the annexed unified interpretations as guidance from 1 January 2026 when applying SOLAS regulations II-2/1.2.10 and 10.11.2.2, and regulation 7.9.4 of the 1994 and 2000 HSC Codes, respectively, and to bring them to the attention of all parties concerned.

ANNEX

UNIFIED INTERPRETATIONS OF SOLAS CHAPTER II-2, AND THE 1994 AND 2000 HSC CODES

SOLAS regulations II-2/1.2.10 and 10.11.2.2, as amended by resolution MSC.532(107), and regulation 7.9.4 of the 1994 and 2000 HSC Codes

- 1 The phrase "fire-extinguishing media" should include the fire-fighting 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 number, reference to type approval/Marine Equipment Directive (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.
