

TO : 所有船東及驗船師  
FROM : CR TAIPEI  
SUBJECT : 2026 年 1 月 1 日起船上禁止使用或存放含有全氟辛烷磺酸(PFOS)之滅火劑

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一 依據海上人命安全國際公約修正案([MSC.532\(107\)](#))及 2000 年高速船安全國際章程修正案([MSC.537\(107\)](#))，自 2026 年 1 月 1 日起，船上禁止使用或存放含有全氟辛烷磺酸(Perfluorooctanesulfonic Acid, PFOS)之滅火劑，並適用於以下情形：

(1) 2026 年 1 月 1 日以後建造之船舶；

(2) 2026 年 1 月 1 日前建造之船舶，應於 2026 年 1 月 1 日以後第一次法定檢驗(客船安全證書、貨船安全設備證書、貨船安全證書、高速船安全證書)前，證明船上使用或存放之滅火劑未含有 PFOS。

(註：依據國際海事組織(IMO)所批准之 [MSC.1/Circ.1290](#) 統一解釋，上述第一次法定檢驗係指規定日期後第一次年度、定期或換證檢驗。對於在規定日期前安龍但在該日期之後交船者，其第一次法定檢驗則為初次檢驗。)

二 為符合前述規定，依據 IMO 所批准之 [MSC.1/Circ.1694](#) 統一解釋(附件 1)，應注意以下事項：

(1) 若滅火劑的 PFOS 含量濃度超過 10mg/kg(0.001%)時，將被視為含有 PFOS；

(2) 船上含有 PFOS 之滅火劑應交由適當的岸上收受設施處理；

(3) 應依據製造商聲明或實驗室測試報告(前述資料應由造船廠、修船廠或設備製造商提供)，證明符合相關規定；

(註：製造商聲明應包含有關泡沫資訊，例如：泡沫類型、生產日期、批號及型式認可等。)

(4) 對於 2026 年 1 月 1 日前已安裝且未附有上述證明文件之滅火劑，應進行取樣檢查，以確認是否含有 PFOS。

三 船上可能包含(但不限於)PFOS 滅火劑之位置如下：

(1) 固定式泡沫滅火系統(Fixed foam fire-extinguishing system)；

(2) 甲板泡沫系統(Deck foam system)；

(3) 可攜式泡沫滅火器(Portable foam fire-extinguishers)；

(4) 可攜式泡沫施放裝置(Portable foam applicators)。

四 請船東於 2026 年 1 月 1 日以後的前述第一次法定檢驗前，確認船上所有滅火劑均具備不含 PFOS 之相關證明文件。若無法提供證明文件，則該滅火劑須交由適當的岸上收受設施處理並更換。如船舶適用於香港安全及無害環境船舶拆解回收國際公約規定，則在移除含有 PFOS 之滅火劑後，應更新船上危害物質清單 (Inventory of Hazardous Materials, IHM) 對應之內容/紀錄。

五 承上，本中心驗船師將於 2026 年 1 月 1 日以後執行船舶第一次法定檢驗時，確認船上已無使用或存放含有 PFOS 之滅火劑，以及船上 IHM 相關內容/紀錄是否已更新(如有移除含有 PFOS 之滅火劑時)。

黃建樺

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MSC.1/Circ.1694  
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**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.

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## 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.

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