

Date: January 12, 2026

Subject: Maritime Firefighting Foam Agent Requirements – Fluorine-Free Compliance

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### Updated Coast Guard and SOLAS Requirements

The United States Coast Guard (USCG) Commandant issued Policy Letter 04-25 on December 12, 2025, outlining updated procedures for how the USCG and Recognized Organizations (ROs) will verify compliance with amendments adopted by the International Maritime Organization (IMO) to the Safety of Life at Sea (SOLAS) Convention relating to fire-extinguishing foams.

The referenced SOLAS provisions include Regulation II-2/10.11, which prohibits the use or storage of fire-extinguishing media, including firefighting foams, containing perfluorooctane sulfonic acid (PFOS) in new ships, and Regulation II-2/1.2.10, which requires existing ships to comply no later than the date of their first Safety Equipment Survey conducted on or after January 1, 2026.

These SOLAS amendments are designated as mandatory requirements and explicitly apply to portable foam fire extinguishers. Any foam extinguishing agent formulation containing PFOS in excess of 10 mg/kg (0.001% by weight) is considered non-compliant with current SOLAS and USCG requirements.

### RELY FX™ Fluorine-Free Foam Compliance

The RELY FX™ P2.5SFFF portable foam fire extinguisher utilizes a synthetic fluorine-free foam (SFFF) agent formulation. The foam concentrate has been independently evaluated by Underwriters Laboratories (UL) using **combustion ion chromatography (CIC)** for determination of **Total Organic Fluorine (TOF)**. Testing of the undiluted concentrate demonstrated **TOF levels of <1 mg/L, meeting the fluorine-free acceptance criteria defined in the applicable UL Special Appendix for foam and water-based-agent fire extinguishers**. Based on this evaluation, the RELY FX™ P2.5SFFF agent contains **no intentionally added fluorinated surfactants** and is designated as fluorine-free for regulatory and environmental compliance purposes.

The RELY FX™ P2.5SFFF model has been tested, listed, and approved by UL in accordance with applicable NFPA and USCG requirements. Product compliance and certification status may be verified in the UL Product iQ directory under File Number EX-28874, which is also permanently identified on each serialized extinguisher nameplate.

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**Should you have any questions or need additional information, contact NFE customer service at 1-800-267-8508.**

Form Number: TB103-0126