

Federal Law Reinstates Portable Fire Extinguisher Requirements at Military Bases

DoD Begins Reinstalling Portable Fire Extinguishers

The FEMA Government Relations Committee (FEMA GRC) is proud to announce that Military installations across the United States are reinstalling portable fire extinguishers in response to new federal mandates advocated by the FEMA GRC — reversing a policy that led to their widespread removal from military bases in recent years. In the months ahead, more DoD buildings will be required to install extinguishers across a broader range of occupancies to comply with updated federal law.

Background: Extinguisher Removal

In 2017, the Department of Defense (DoD) updated the fire code for military bases, the Unified Facilities Criteria (UFC) 3-600-01, *Fire Protection Engineering for Facilities*, to permit the removal of portable fire extinguishers in buildings equipped with automatic sprinkler systems and fire alarm systems. This change led to the gradual elimination of extinguishers across military installations through attrition — units removed for servicing were not returned.

Recognizing the risk posed to personnel and property, FEMA GRC and its member organizations — Amerex Corporation, Brooks Equipment Co., and Buckeye Fire Equipment — initiated a coordinated advocacy campaign to reverse this policy. FEMA GRC's newest member, Badger Fire Protection, has since joined in support of implementation efforts.

FY20 NDAA Reinstates Extinguisher Requirements

In 2019, FEMA GRC secured an amendment to the 2020 National Defense Authorization Act (NDAA) that mandated that DoD align its fire protection requirements with national consensus codes. In response, the UFC was updated in May 2021 to remove the allowance for sprinklers in lieu of extinguishers and require portable fire extinguishers in accordance with NFPA 101. This has led directly to bases purchasing portable fire extinguishers and installing them throughout most building occupancies, including assembly, business, and health care according to the installation requirements of NFPA 10.

FY22 NDAA Expands Extinguisher Requirements

While adoption of NFPA 101 was a significant step forward, FEMA GRC continued to press for installation of extinguishers in more occupancies, as required by NFPA 1 – again, with the aim of securing the same level of layered fire protection at federal buildings and military bases that civilians enjoy in nearly every building in the country.

In 2021, FEMA GRC successfully secured new language in the 2022 NDAA, requiring DoD to update the UFC to require extinguishers according to NFPA 1. The FY22 NDAA was signed into law in December 2021. This legislation requires the DoD to take steps to expand extinguisher coverage to additional occupancies as required by NFPA 1, including apartment, educational, and day-care uses. See the table below for a list of these additional occupancies.

Additional Occupancies where Portable Fire Extinguishers are Required by NFPA 1, Fire Code

Occupancy Use	Extinguishers Required
Apartment	Yes, building exterior mounting allowed
Day-care	Yes
Educational	Yes
Hotel and Dormitory	Yes
Industrial	Yes
Lodging and rooming house	Yes
Storage	Yes, with some exceptions

For the full list of occupancies required by NFPA 1, click [here](#).

Implementation Status and Next Steps

Implementation of the 2022 NDAA has been delayed, and the UFC has not yet been formally updated to reflect NFPA 1. Nonetheless, some bases are proactively reinstalling extinguishers according to the anticipated update, as the DoD is expected to formally revise the UFC in the coming months.

FEMA GRC strongly encourages military facilities to begin using NFPA 1 as the reference fire code for portable fire extinguisher installation and take proactive measures to ensure compliance before the UFC is formally updated. Likewise, fire equipment distributors should familiarize themselves with these updates and support facilities in achieving compliance with NFPA 1. Doing so will ensure the highest level of safety for occupants and improve the protection of government assets.

FEMA GRC continues to advocate for timely implementation of these requirements and stands ready to support installations and fire safety professionals in meeting these new standards.

About FEMA GRC

The Fire Equipment Manufacturers' Association's Government Relations Committee (FEMA GRC), comprised of Amerex Corporation, Badger Fire Protection, Brooks Equipment Co., and Buckeye Fire Equipment, along with the strong support and financial contribution from NAFED, has been working since 2003 to ensure that fire and building codes across the country are built around layered fire protection that will save lives and reduce property damage.



Fire Equipment Manufacturers' Association 101

The Fire Equipment Manufacturers' Association is the premier trade association representing leading brands, and spanning dozens of product categories related to fire protection. The Fire Equipment Manufacturers' Association is comprised of four divisions represented by product categories: portable fire extinguishers, interior equipment, fire hose and pre-engineered suppression systems. These divisions work together in an effort to promote Layered Fire Protection, Life Safety and initial response when disaster strikes. Members of the Fire Equipment Manufacturers' Association have formed a subgroup, the Government Relations Committee (GRC), to address legislative and regulatory issues relating to portable fire extinguishers and pre-engineered systems. The GRC's main goals focus on helping to educate officials by advancing a layered fire safety philosophy that reflects the need for both sprinklers and portable fire extinguishers. This newsletter is published periodically to communicate to key members of the fire services and code officials on the importance of layered fire safety and the role that special application fire suppression systems and portable fire extinguishers play.