

Updated legal requirements for registered owners of aircraft with halon fire suppression systems

Halons are the active ingredient in fire suppression systems on many aircraft. Halons are a type of Ozone Depleting Substances (ODS) subject to controls under European Regulation [\(EU\) 590/2024](#) on substances that deplete the ozone layer (ODS Regulation). Under this regulation, halons are now generally banned although some types can still be used in aircraft suppression for a limited time under “critical use” exemptions. This document provides information on the following mandatory requirements for owners of aircraft that still contain halons.

Key legal requirements for registered owners of aircraft containing halons:

- Halons can no longer be installed in new aircraft and halons in existing aircraft must be decommissioned by mandatory “end dates”. These dates are outlined in the Regulations referred to above.
- An ODS Licence must be obtained if importing/exporting aircraft containing halons.
- Every year by 31st March a halon return report must be submitted to the EPA to track remaining halons in aircraft until they are decommissioned (**this year we have extended the deadline until 30 April 2025 due to recent administrative changes**)

Removal of Halons from Aircraft

Under the regulation, **no new aircraft can install equipment containing halons**. For existing aircraft, “End Dates” apply; this is the date after which halons shall not be used and by which fire extinguishers and fire protection equipment containing halons shall be decommissioned and replaced by alternative fire suppression systems.

End Date for halons within fixed systems for protection of lavatory waste receptacles

The end-date for the use of Halons in all aircraft lavatory waste receptacles was **31/12/2020**. The use of halons for this purpose after this end-date is not compliant with the provisions of the ODS Regulation. Therefore, any aircraft still using halons are required to retrofit the lavatories to remove the halons and to replace them with suitable alternatives without delay.

End Date for Hand-Held (Portable) Extinguishers containing Halons

The end date for all hand-held (portable) fire extinguishers in cabin and crew compartments containing halons is **31/12/2025** after which they must be replaced with suitable alternatives.

What to Do with Halon Cylinders Once Removed from Aircraft

Halons contained within the removed cylinders must be treated as hazardous waste and should be recovered for recycling or reclamation to an appropriate facility. The destruction of halons is prohibited unless it is not technically viable to undertake reclamation and subsequent re-use.

Waste records pertaining to the recycling or reclamation of halon cylinders swapped out from aircraft should be retained for inspection by the EPA if required.

How to Obtain an ODS Licence

If you import or export an aircraft that contains halons you must obtain an ODS import or export licence (separate licence types apply). To do this you must firstly register on the European Commission's ODS Licensing system (a once-off requirement) and then apply for a bulk licence. The ODS Licensing System can be found here: [Business portal - European Commission](#). Please note that there is no fee associated with these licences.

Since March 2025, ODS licences can be used for multiple shipments by the same licence holder for up to three years. For the purposes of import, the undertaking holding the import licence will be known as the importer. Where the importer is not available, the undertaking holding that licence shall be the declarant indicated in the customs declaration. Please note that separate licences will be required for different companies when importing or exporting an aircraft – i.e. each importer and exporter will require their own, individual licences.

Further guidance is available at [Business portal - European Commission](#) and any difficulties in accessing the licensing sys can be sent directly to clima-ods@ec.europa.eu. Any other queries can be directed to the EPA (Ireland) at ODS@epa.ie.

Annual Reporting

It is also a requirement to submit an annual report to the EPA (Ireland) under Article 24 of Regulation (EU) 2024/590. All registered owners of aircraft which have halons onboard are required to register on the Environmental Protection Agency's (EPA) online EDEN portal at www.edenireland.ie (if not already done) and complete an annual return before **31st March** for the previous calendar year. The information gathered will be treated confidentially and only summary data collated from all the individual surveys will be included in the National Report for Ireland. Please refer to the [Halon Critical Use Survey Reporting Module in EDEN – Guidance Document \(EPA, February 2024\)](#) for more information on how to submit their data. If you have any queries, please contact the EPA at ods@epa.ie