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Title: Portable Halon Fire Extinguishers – end dates for aircraft use

Advisory Memoranda are provided for information purposes only and must not be misconstrued as formally adopted Acceptable Means of Compliance (AMC) or as Guidance Material (GM).

1. Introduction

The purpose of this AAM is to remind pilots and owners of aircraft of their obligations to remove portable halon fire extinguishers from aircraft by 31st December 2025, in accordance with Regulation (EU) 2024/590 of the European Parliament and of the Council, on substances that deplete the ozone layer. This regulation applies to all aircraft, registered in an EU member state.

The guidance provided in this AAM however is limited to pilot and owners of general aviation aircraft, defined here as aircraft with an unpressurised cabin (9 passengers or fewer) and small rotorcraft (CS-27). Aircraft owners and operators of larger aircraft should assess the above regulation in accordance with their normal procedures.

2. Background

Halon fire extinguishing agents (such as Halon 1211, Halon 1301 and Halon 2402) have been widely used in aviation due to their effectiveness and low weight.

However, halons are **ozone-depleting substances** controlled under the **Montreal Protocol** and EU environmental legislation (notably Regulation (EU) 2024/590 on substances that deplete the ozone layer).

To comply with international obligations, ICAO and the European Commission have mandated the **phase-out of halon use**, including **portable halon fire extinguishers in aircraft cabins and cockpits**.

3. Key Requirements for Light Aircraft

From 31 December 2025, halon portable fire extinguishers may no longer be carried on board light aircraft.

Aircraft owners and operators must:

- Identify any installed or portable halon fire extinguishers in their aircraft.
- Arrange for removal and environmentally responsible recycling/reclamation of halon extinguishers.
- Replace them with approved, halon-free extinguishers suitable for aviation use.
- Update aircraft documentation (modification/alteration status, equipment list, Minimum Equipment List, if applicable) to reflect the change.

The obligation to carry a handheld fire extinguisher arises from manufacturer requirements and operational regulations, including:

- For EASA light aircraft, Parts CAT, SPO, and NCO of Regulation (EU) No. 965/2012 (“Air Operations”) and Part BOP of (EU) 2018/395; and
- For national aircraft, IRISH AVIATION AUTHORITY (OPERATIONS) ORDER, 2024.

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For example, a handheld fire extinguisher is not required for non-complex, non-commercial EASA aircraft, but it may be prudent to carry one.

4. Safety Considerations

Replacement extinguishers should be:

- Aviation approved (to a relevant standard such as ETSO-2C515 ‘Aircraft Halocarbon Clean Agent Hand-Held Fire Extinguisher’ or equivalent).
- Installed by modification/alteration to consider:
 - a. Extinguishing agent - should be appropriate to the kinds of fires likely to occur
 - b. Extinguisher rating - (cabin volumes to 5.66 m³ – rating U.S.- UL 2B:C is acceptable)
 - c. The hazard of toxic gas concentration
 - d. Fire extinguisher location - should not interfere with pilot’s view or systems operation
 - e. Fire extinguisher supporting structure
 - f. Emergency procedures
- Aircraft weight and balance documentation should be checked after installation.

Note: In case of replacement of a Halon 1211 handheld extinguisher with a 2-BTP handheld extinguisher having the same UL rating, of similar dimensions, shape and mass (within a 10 % variation), located in the same position, and similar accessibility (release and removal), typically no additional substantiation for the modification/alteration is necessary.

For EASA certified aircraft, refer to CS-STAN CS-SC108a — *Exchange of handheld fire extinguishers for halon-free type*.

5. Compliance & Enforcement

After 31 December 2025, carriage of halon extinguishers may result in enforcement action during airworthiness reviews, ramp inspections, or audits, where the carriage of an alternate extinguisher is required by the Type Certificate Holder.

Certificates of Airworthiness or Airworthiness Review Certificates may not be issued/renewed for aircraft which have halon fire extinguishers in the cabin or cockpit which are not in compliance with the approved maintenance data, where available.

Insurance and liability implications may also arise if non-compliance is discovered following an incident.

As the Irish Aviation Authority is not the organisation with responsibility for this regulation, the IAA may not assist with any flexibility or exemptions to this requirement. Where an owner/operator can not comply with the regulation before 1 Jan 2026, they should contact the Environmental Protection Agency at O.DepletingSubstance@epa.ie for further guidance.

6. Further Guidance

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Operators should consult their continuing airworthiness management organisation (CA(M)O) or maintenance provider e.g. ILAS/NMAI for approved replacement options.

Guidance on disposal of halon is available from national environmental agencies and authorised waste disposal contractors.

EASA and ICAO publications on halon replacement provide technical reference material for operators. In Ireland, the Environmental Protection Agency publications provide additional information regarding ozone-depleting halon.

- [Environmental Protection Agency Ozone Depleting Substances](#)
- [SKYbrary Halon Fire Extinguishers](#)
- [EASA CS-23 Amendment 3 Change Information](#)
- Environmental Protection Agency Fact Sheet – see Appendix 1

✂ Action Required:

1. Inspect your aircraft now for halon extinguishers.
2. Arrange for replacement with compliant alternatives.
3. Ensure proper recovery through authorised channels.

✂ Recycling

Please note that halons contained in fire extinguishers must be recovered for recycling or reclamation once the cylinders have been removed from the aircraft. Their destruction is prohibited unless there is documented evidence that the purity of the recovered or recycled halon does not technically allow its reclamation and subsequent re-use. Undertakings destroying halons in such cases shall keep this documentation for at least 5 years. Such documentation shall be made available, upon request, to the Environmental Protection Agency or to the EU Commission.

The necessity for recycling or reclamation of halons is to ensure that sufficient quantities of halons remain available for their use in other permitted aviation fire suppression situations (as new halon production no longer occurs under the terms of the Montreal Protocol on substances that deplete the Ozone Layer).

When waste, halons cylinders are classified as hazardous waste and can only be managed by appropriately authorised waste facilities. The companies listed at the following link may deal with such waste: [Authorised Waste Facilities That Are Known To Cater For The Management Of Waste Refrigerants | Environmental Protection Agency](#)

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1 Appendix 1 – Environmental Protection Agency Fact Sheet



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). **Halons can no longer be installed in new aircraft.**

- Halons in existing aircraft must be decommissioned by mandatory “end dates”. These dates are outlined in Annex V of 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.

Aircraft Halon “End Dates”

- **31/12/2020:** End date for halons within fixed systems for protection of lavatory waste receptacles.
- **31/12/2025:** Hand-held (portable) fire extinguishers in cabin and crew compartments containing halons.
- **31/12/2040:** All fixed system extinguishers to be decommissioned.



How to Obtain an ODS Import or Export Licence

1. Register on the European commission’s ODS licensing system.
2. Apply for a bulk license.

The ODS licensing system can be found here: [Business portal - European Commission](#) (There is no fees involved with the licenses).

Since March of 2025, ODS licenses can be used for multiple shipments by the same license holder for up to three years. Please note, separate licences are needed for exports and imports.



Annual Reporting

Under Article 24 of the Regulation, it is a requirement to submit an annual report to the EPA to track remaining halons in aircraft until they are decommissioned.

- All registered owners of aircraft which have halons onboard are required to register on the EPAs online EDEN portal.
- An annual return must be completed **every year before the 31st of March** for the previous calendar year.

Further information: <https://www.epa.ie/our-services/compliance--enforcement/air/ozone-depleting-substances-ods/halon-critical-use-survey/>