FIRE EQUIPMENT MANUFACTURERS' ASSOCIATION



Saving Lives, Protecting Property.

Update: Restoring Portable Fire Extinguishers on DoD Installations

Since 2017, many Department of Defense (DoD) bases removed portable fire extinguishers if buildings had sprinklers and alarms—an allowance created by Unified Facilities Criteria (UFC) 3-600-01. Through FEMA's Government Relations Committee (FEMA GRC) advocacy, federal law now requires DoD to realign with national codes and restore extinguishers across military bases. Some bases have already begun reinstalling units while the DoD finalizes its next code update.

Background: Extinguisher Removal

In 2017, DoD updated the building code for military bases, the UFC 3-600-01 to permit the removal of portable fire extinguishers in buildings equipped with automatic sprinklers and fire alarms. This led to the elimination of extinguishers across military bases through attrition — units removed for servicing were not returned. Recognizing the risk to personnel and property, FEMA GRC initiated an advocacy campaign to reverse this policy.

Congress Restores and Expands DoD Extinguisher Requirements

Through FEMA GRC advocacy, Congress made two key reforms to restore portable fire extinguisher requirements on DoD bases. The FY2020 National Defense Authorization Act (NDAA) required the DoD to align its fire protection policies with national codes. In response, the UFC was updated to remove the allowance for sprinklers in lieu of extinguishers and mandate compliance with NFPA 101. This has led to reinstallation of portable fire extinguishers across most building occupancies—such as assembly, business, and healthcare—in accordance with NFPA 10. FEMA GRC successfully advocated for additional provisions in the FY2022 NDAA. The law directs DoD to update the UFC further to require extinguishers in accordance with NFPA 1, expanding coverage to additional occupancies including apartment buildings, educational facilities, and day-care centers, to ensure a consistent, layered level of fire protection for military personnel.

Occupancies where Portable Fire Extinguishers are Required by NFPA 101

Occupancy Use	Extinguishers Required
Ambulatory health care occupancies	Yes
Assembly occupancies	Yes, but not seating and outdoors
Business occupancies	Yes
Detention and correctional occupancies	Yes, can be locked or in staff areas
Health care occupancies	Yes
Hotel and dormitory occupancies	Yes
Mercantile occupancies	Yes
Occupancies in special structures	Yes
Residential board and care occupancies	Yes

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

Next Steps

DoD has yet to update the UFC to reflect NFPA 1 yet some bases are installing extinguishers according to the anticipated update. The FEMA GRC is encouraging bases to use NFPA 1 as the fire code for portable fire extinguisher installation. Likewise, distributors should familiarize themselves with these updates and support facilities in achieving compliance with NFPA 1. The FEMA GRC is ready to support installations and fire safety professionals in meeting these new standards.