

# Position Paper

9 September 2015



Fire extinguishers are means of first defence for firefighting and if used are used in an immediate emergency situation.

The CLP regulation ((EC) No 1272/2008 on the classification, labelling and packaging of substances and mixtures) became the only legislation to apply to the classification and labelling of both substances and mixtures from the 1st June 2015.

Fire extinguishers use pressurized vessels and contain substances and mixtures and therefore may be impacted by the new legislation.

Looking only at the actual CLP legislation would make CLP labelling of fire extinguishers probably required, both in terms of chemical hazard and gas under pressure.

However, considering the intended purpose of fire extinguishers (first line of defence in an immediate fire emergency situation) the CLP labelling still is not recommended as it would contradict fire extinguisher's use and accordingly jeopardise its efficiency, which would highly increase the risk of fire's expansion. Here the risks have to be balanced:

- A hazard labelling would possibly be contra productive since in an emergency situation, it could question and confuse the user and as a result delay the use of a fire extinguisher, or induce a misuse of it or even make the user abort to use it. This ultimately could contrary the desired effect and dramatically increased harm to human health, environment and property;
- Nonuse of a fire extinguisher or extended exposure to fire resulting from confusion on its proper use increases the exposure to inhale fume/smoke from the fire, which provides a higher risk for the user than the normal use of the fire extinguisher;
- CLP labelling would also in some aspects even contradict the usage of extinguishers: Hazard statement 280 which accompanies the GHS04 Gas under pressure label precludes the use of package (the extinguisher) near a fire.

For the exact same reasons, the German REACH CLP Helpdesk made statements in 2014 to not recommend to CLP label the fire extinguishers.

Fire extinguishers have been shown to be effective in limiting fires and saving lives. Anything that may hide or reduce that effectiveness should be avoided.

**For all these reasons the Eurofeu Portable Fire extinguisher Section recommends that fire extinguishers are exempted from CLP labelling.**

A unified understanding of the European regulations is strongly desirable and of high importance for the firefighting industry since the companies are active and competing in many different European countries.

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