

C6-AFFF HOFFE Guidance Note

The following is intended to be a short form key point overview of the requirements contained in the Fire Fighting Chemicals Group Standard 2021 - HSR002573; the legislative instrument (i.e., the law) covering firefighting chemicals in New Zealand.

It has been written to provide information that is relevant to Hand Operated Fire Fighting Equipment (HOFFE) containing C6 Aqueous Film Forming Foams (C6-AFFF) only. This includes portable and wheeled foam fire extinguishers as well as fire hose reels with foam making capabilities.

While every care has been taken in the production of this document, readers are advised to make themselves familiar with the full provision of HSR002573.

USE

- › You can still **use** HOFFE that contains C6-AFFF up until 3 December 2025. At which point it must be removed from service and **correctly disposed of**.
- › **Use** includes operation of the extinguisher in an **emergency** as well as testing and maintenance activities. It does not include training.
- › **Emergency** means an event requiring an immediate action to protect and preserve life, prevent injury, or avoid damage to property, and includes a fire (or an alarm of fire) or a hazardous substances emergency (i.e., a spill).

REPLACEMENT

- › A number of approved Synthetic Fluorine Free Foams (SFFF) are available for use in similar applications to AFFF.
- › However, it should be noted that SFFF agents are not 'drop-in' replacements for AFFF agents. For fire extinguishers, the performance rating of a given size of extinguisher may be different:
 - 9L AFFF 4A | 30B
 - 9L SFFF 4A | **20B**
- › Noting the points above, the Fire Protection Association NZ (FPANZ):
 - Does not support agent-only replacements; and
 - Recommends the complete replacement of the equipment; and
 - Recommends that members support their clients to prepare a replacement schedule based on:
 - (a) replacement of any AFFF fire extinguishers due for pressure testing prior to 3 December 2025; and
 - (b) replacement of any other HOFFE utilising AFFF no later than 3 December 2025.

C6-AFFF HOFFE Guidance Note *cont.*

DISPOSAL

- 】 C6-AFFF, and any associated waste products such as wash water, are considered a Hazardous Substance by the Environmental Protection Authority (EPA).
- 】 These products must not, in any circumstances, be disposed of via foul water (sewer) or stormwater drains, or any other method where it could potentially end up in the environment.
- 】 Any container that has held C6-AFFF must be treated as hazardous waste or thoroughly cleaned so as to remove, as far as reasonably practicable, any residual product. The Agrecovery Triple Rinsing Guide (<https://agrecovery.co.nz/wp-content/uploads/2015/02/AGRECOVERY-FLIER-v3.pdf>) for agricultural chemicals is a suggested resource for developing a suitable cleaning methodology.
- 】 FPA NZ reiterates that the disposal of fire-fighting foams, containers, and their waste products, must be done correctly and it is recommended that expert guidance should be obtained. Known operators in this field are:
 - ChemWaste Services (Envirowaste Services Limited)
 - Waste Management Limited
 - HazChem Services Limited

CONSEQUENCES

- 】 Failure to comply with the conditions of the Fire Fighting Chemicals Group Standard (FFCGS) is an offence under the Hazardous Substances and New Organisms Act 1996.
- 】 Marsden Point Refinery (Channel Infrastructure NZ Limited) was fined \$169,000 in November 2022 for discharging PFAS containing fire-fighting foam into the environment during training exercises.

For further information please use this guidance note in conjunction with; PS-05-Hand Operated Fire-Fighting Equipment (HOFFE) Obligations under the Fire Fighting Chemical Group Standard 2021-HSR002573

For further assistance please contact the Fire Protection Association of New Zealand or a FPA NZ member company (www.fpanz.org).

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