

Statement

Euralarm General Statement on ECHA proposal for PFAS restriction 3 October 2023

1. Introduction

Euralarm, the European trade association representing the fire safety and electronic security industry, fully supports the Commission's Chemicals Strategy for Sustainability, and we believe that individual substances that pose an unacceptable risk due to their properties and use profile should be restricted or regulated based on scientific evaluation.

The proposed general ban on the manufacture, use and placing on the market of any kind of PFAS (in substances, components and devices) would have a massive impact on nearly all our member companies and the users of our fire detection, fire protection and security systems, with limited benefit to the environment.

[Euralarm has issued a fact sheet](#) on the specific impact of PFAS restriction on firefighting gases. This further statement provides specific additional considerations from our fire safety, extinguishing and security sectors and supports the general position paper issued by Orgalim and provides specific considerations from our fire safety and security sectors.

2. General considerations

Euralarm supports the general considerations laid down in the [position paper issued by Orgalim on 31 August 2023](#) and calling for a risk-based approach for the restriction of PFAS. Restriction should only be imposed where the benefits for the environment outweigh the disadvantages.

3. Specific considerations from fire safety and security sectors

Our members place on the EU market fire detectors, sprinklers and extinguishing systems, intrusion detectors, access control systems and all the devices supporting these first line elements in order to build Fire Detection and Alarm Systems, Fire Suppression, Fire Extinguishing Systems and Security Systems. Fire safety systems efficiently limit the degradation of buildings in case of fires by triggering an early warning and early suppression or extinguishing means. By doing so, they not only protect people, assets, buildings and critical infrastructures, they also prevent the unnecessary release of noxious gases in the event of a fire and any demolition and reconstruction.

Those systems incorporate PFAS in extinguishing gases, PTFE sealant tapes, gaskets, o-rings, plastic housings and electronic components. PFAS provide specific properties that ensure the effectiveness of these elements, e.g. fire retardant, non-flammable, the operational and lifetime durability of the products.

These systems, being part of the building, have a very long lifetime. It is generally agreed that fire safety, extinguishing and security systems may remain in use for multiple years. Our industry therefore generates a very small quantity of waste devices which are typically captured under the WEEE directive or to the general waste framework directive with mandatory collection and recycling of the materials. The risk and quantity of PFAS released to the environment is therefore extremely low.

Furthermore, devices for fire detection and alarm systems as well as for fire extinguishing systems are in the scope of the Construction Product Regulation (CPR) and therefore subject to third-party certification before placing on the EU market. Restriction of PFAS in components used to build fire safety and extinguishing systems will require

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component manufacturers to provide PFAS-free alternatives, if they exist, probably with different physical and chemical properties imposing some re-design. Any modification to those products requires an assessment, e.g. by the notified body having delivered the CE certificate of constancy of performance. A blanket ban of PFAS will generate very high costs and very long delay for the manufacturers to re-design, re-test and re-certify their whole range of products. Third-party certification of security products and systems is often on a voluntary or market-demand basis to independently demonstrate the efficiency, reliability, robustness and resilience of these systems. Consequently, this change and need for re-certification would affect the availability of the products, likely increase their price to the customer, and thus reduce their affordability, negatively impacting the protection of people, assets, buildings and infrastructures.

4. Conclusion

Beyond the general concerns expressed by the technology industries, Euralarm has provided here specific considerations from our sectors showing that a blanket ban of PFAS would have little environmental benefits but could reduce the protection of people, assets, buildings and critical infrastructures.

We therefore definitely call for a risk-based approach on the ban of PFAS.

We remain available to further discuss this position.

About Euralarm

Euralarm represents the fire safety and security industry, providing leadership and expertise for industry, market, policy makers and standards bodies. Our members make society safer and secure through systems and services for fire detection and extinguishing, intrusion detection, access control, video monitoring, alarm transmission and alarm receiving centres. Founded in 1970, Euralarm represents over 5000 companies within the fire safety and security industry valued at 67 billion Euros. Euralarm members are national associations and individual companies from across Europe.

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Note: The English version of this document, GD-2023-0x20, is the approved Euralarm reference document.