

Position paper

Request for the consideration of products that explicitly serve to protect human life

While it is often beneficial to have portable batteries that users can remove and replace using commercially available tools throughout the product's lifespan, there are cases where this requirement may not be appropriate and could even compromise user safety and appliance functionality. One such scenario applies to devices like smoke alarms, carbon monoxide detectors, and gas alarms.

Background

Smoke alarms, carbon monoxide detectors, and gas alarms are safety devices that are designed for use in residential settings, alerting occupants to fire, smoke, or hazardous gases (especially during sleep). They allow humans to respond appropriately and evacuate if necessary. To ensure proper operation, all these products incorporate a portable battery. Notably, a substantial number of these devices in Europe (particularly smoke and CO alarms) come with permanently soldered 10-year batteries.

This category of products explicitly serves to safeguard human lives within their living environment and includes:

- Smoke Alarms (according to hEN 14604)
- Carbon Monoxide Alarms (according to EN 50291-1)
- Gas Alarms (according to EN 50194-1)

As per Article 11(3) of Regulation (EU) 2023/1542, the obligations outlined in Article 11(1) do not apply when a continuous power supply and a permanent connection between the battery and device are necessary for user safety. This underscores the critical role of safety considerations regarding battery replaceability and exchangeability. The Joint Research Centre (JRC) report titled "Technical Input for the Guidelines on Removability and Replaceability of Portable and Light Means of Transport Batteries" further delves into these considerations. Notably, hearing aids are cited as exemplary devices eligible for the exemption outlined in Article 11(3), which is entirely reasonable.

We wish to emphasize that the rationale provided for hearing aids applies equally to the specific group of products mentioned earlier.

Justification

- Life-Saving Purpose: The primary function of these devices is to safeguard lives within residential environments.
- Sensor-Based Service Life: Unlike conventional product design considerations, the service life of these devices relies solely on physical sensors. It is determined by physical conditions and limits.
- 10-Year Batteries: A significant subset of these devices operates on a single battery throughout their entire 10-year service life. This level of sustainability and efficiency is remarkable.
- Permanently Soldered Batteries: Given their purpose and longevity, it is neither practical nor necessary for end-users to replace batteries. Consequently, 10-year batteries are now permanently soldered.
- Safety Risk: Introducing replaceable 10-year batteries would not only be futile but also pose safety risks similar to those associated with hearing aids.

Request

We urge the Commission to extend the Article 11(3) exemption to include smoke alarm devices, carbon monoxide alarms, and gas alarms. These products should meet the following criteria:

- Life Protection: Explicitly designed to protect human lives within living environments.
- EN Product Standard: Tested and approved according to valid EN standards.
- 10-Year Battery: Powered by a portable battery that reliably supplies the device for at least 10 years.
- Recycling Safety: Easily removable batteries to ensure safe handling in recycling centers.

Only products meeting all four conditions should be considered for inclusion.

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.

Gubelstrasse 11 • CH-6300 Zug • Switzerland

E: secretariat@euralarm.org

W: www.euralarm.org