

Position Paper

Euralarm Position Paper on proposal for definition of important products category #16 in Cyber Resilience Act – 9 September 2024

1. Introduction

The Cyber Resilience Act (CRA) is expected to be published in the Official Journal of the European Union (OJEU) in September or October this year. This new Regulation will provide essential requirements enforcing protection mechanisms on digital products (hardware and software) to improve their resilience against cyber-attacks. In addition, essential requirements will ensure that identified vulnerabilities are duly handled and result in updates to the products during the whole support period of the product.

The Regulation also imposes conformity assessment procedures for the demonstration of compliance with these essential requirements. While most digital products are announced to benefit from the procedure of self-assessment, regardless of the existence of harmonised standards, and presumption of conformity when a harmonised standard (cited in the OJEU) is applied, categories of important products and critical products are listed in the CRA and associated with a stricter conformity assessment procedure. At least 1 category of important products Class I is of importance for the EURALARM members. This one is listed in Annex III of the CRA as “Smart home products with security functionalities, including smart door locks, security cameras, baby monitoring systems and alarm systems”.

This category will require either the application of a harmonised standard cited in the OJEU or an EU type examination by a CRA notified body. It is therefore of utmost importance to have clear and unambiguous definitions for it.

Euralarm, the European trade association representing the electronic fire safety and security industry, greatly appreciates the opportunity to propose definitions that can be endorsed by the European Commission in the Implementing Act complementing the CRA. After due consideration of the wording of the category in Annex III and the criteria in Article 7(2) of the CRA, the present position paper provides such proposals for the category mentioned above.

2. Definitions for “Smart home products with security functionalities”

The wording in Annex III of the CRA for this category is:

Smart home products with security functionalities, including smart door locks, security cameras, baby monitoring systems and alarm systems

The 2 key parts in the wording of this category are “smart home products” and “security functionalities”. It is understood that the intersection of these 2 groups of products will form the category. The examples given in the remaining part of the wording have been considered to understand the intention of the co-legislators. This section provides a proposal for these 2 key parts.

smart home product

Product which the intended use as declared by the manufacturer states that the installation, configuration or maintenance may be performed by a consumer in a residential environment and which can communicate itself over the internet.

This definition includes consumer IoT (connected) products which we understand are targeted by the CRA Annex III category 16. "Smart home products" may have an additional intended use for commercial and/or industrial environment. So, products fulfilling the proposed definition for "smart home product" are included even if they have also been designed and intended to be used in commercial and/or industrial environments. We deliberately re-use the wording from the Delegated Regulation (EU) 2022/30 enforcing Article 3(3)(d) of the Radio Equipment Directive (RED): "can communicate itself over the internet". This allows to benefit from the experience with the RED on this matter.

security functionalities

Functionalities of the device that, if they are manipulated, could impair personal security, where personal security refers to the state of being safe from danger or harm, i.e. functionalities that protect oneself and one's property from threats such as theft, violence, hazardous gas or fire.

This definition makes extensive re-use of the criteria in Article 7(2) of the CRA. It also makes clear that Intruder Alarm Systems, smart door locks, security cameras, smoke alarm devices, carbon monoxide alarm devices and gas alarm devices are targeted.

Hence, looking to the intersection of the 2 key parts defined above, the following products are examples of important product Class I belonging to this category:

- internet connected control panel of burglar alarm system;
- internet connected alarm transmitter;
- internet connected video camera for security purposes;
- internet connected door lock;
- internet connected smoke alarm device;
- internet connected CO alarm device;
- internet connected gas alarm device

but only where manufacturer states that they are for residential use and that the installation, configuration or maintenance may be performed by a consumer.

Also, the following products are examples that do not belong to this category:

- products with security functionalities that cannot be connected to the internet;
- control panel of fire safety system where manufacturer states that the installation, configuration and maintenance is required to be performed by qualified personnel;
- control panel of security system where manufacturer states that the installation, configuration and maintenance is required to be performed by qualified personnel;
- products with intended use (as stated by the manufacturer) for commercial and/or industrial environment only.

3. Conclusion

Clear definitions for the categories of important products are necessary to improve the legal certainty for our members. Category number 16 of the CRA is of primary importance for the Euralarm membership. For this reason, we have prepared the proposals laid down in this paper. They build the bridge between our reading of the words provided by the co-legislators and the products that our members are placing on the EU market.

We are looking forward to discussing them and any other input with the CRA staff at DG CNECT.

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-2024-010, is the approved Euralarm reference document.