

## Briefing

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Subject: Euralarm response to the EU Commission Impact Assessment on:  
“**Establishing an EU harmonised certification system for alarm systems components**”

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1. Euralarm is supportive of the need to adopt a legislative approach to the testing & certification of alarm products to meet the initiative announced in the Commission Communication ‘Security Industrial Policy Action Plan for an innovative and competitive Security Industry’.

We therefore support the objectives laid out in the Inception Impact Assessment and favour your **option 3** for a legislative approach as stated in the assessment.

2. Euralarm recognises the Commission’s option for legislating using CE marking (Option 3b), as this brings about the use of harmonised European standards for alarm system components giving ‘presumption of conformity’ by outlining the essential requirements. **However**, Euralarm does not believe this approach will provide the clarity and recognition of conforming products as CE marking is a recognised Mark of SAFETY and **not** of PERFORMANCE/QUALITY of the product.

3. Euralarm therefore recognises the Commission’s **Option 3a** as the most favoured and acceptable method of achieving single market testing and certification by way of a separate EU-Security Mark.

We believe this will be the most effective way of presenting conforming product on the market, with an emphasis on product performance and quality. This will improve the visibility and brand identity of the certification. It will also add value to EU exports into the global market, add value to the EU economy and ultimately increase economic growth.

For the legislation to be truly effective, the EU-Security Mark should be the only Mark permitted on products to avoid National voluntary Marks being added.

We note in your proposed Option 3a there is no mention of the use of European standards to achieve the Mark. The proposal states “certain security requirements”. We would seek assurance that these requirements would be based on the use of proven European standards: in this case the CENELEC TC79 portfolio of component standards, which includes those from EN50131, EN 50136, EN 62676, EN 60839 and EN50134 suite of standards.

We note the scope of the proposal states “components of alarm systems”, and would wish to remind the Commission that the CENELEC TC79 portfolio of standards includes other types of standards, such as application and system standards, which are not relevant to the scope of this proposal. Euralarm would, of course, welcome the opportunity to assist the Commission in identifying the correct component standards for use.

We would also bring to your attention that the use of the intruder and hold-up alarm system standards (EN50131 suite) utilises ‘grading’ as a means of determining the performance of products. Euralarm believes that legislation should only be applicable to grades 2, 3 and 4 as these are the recognised grades in the professional alarm system market.

Euralarm recognises that legislating for the single market testing and certification will need to allow a period of time for the transition from 'National voluntary Marks' to an EU-Security Mark. Therefore Euralarm proposes (subject to EC rules) that the implementation of the legislative change should be applied immediately and that a 24-month lead-in time for manufacturers is needed to ensure a smooth transition.

Where new product standards are published that are subject to this legislative proposal, it is recommended the 'Date of Withdrawal' (DOW) cited in the foreword of the standard is used as the recognised date for compliance to the Mark.

To ensure the correct component standards are used in the scheme, it would be sensible to have these listed in the OJEU so that it is clear which apply.

Euralarm welcomes the Commission's offer for marketing support to raise awareness of the final legislative outcome. And the implementation of the Mark in the market Euralarm would welcome the opportunity to assist the Commission further in its proposals as they are developed.

## About Euralarm

Euralarm represents the electronic fire 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, 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, SC-SECU-0112, is the approved Euralarm reference document.*