

Approved Recommendation

Euralarm recommends objecting to the scope of draft prEN 40000-10 prepared by CEN/TC 224 in the context of the CRA – 30 June 2026

Euralarm TG Cybersecurity has approved the circulation of the recommendation below to all Euralarm members.

Voting recommendation

Euralarm recommends expressing a strong objection to the current scope of draft prEN 40000-10 which threatens to undermine the free choice of standards for demonstrating compliance with CRA essential requirements for fire safety and security products in the default category.

Public enquiry closing around 20 July 2026 (refer to your NSB for the exact date, preferably by 3 July for France)

CEN/TC 224 has been requested by the European Commission to draft a harmonised standard supporting the Cyber Resilience Act (CRA) for the category of important products “*Identity management systems and privileged access management software and hardware, including authentication and access control readers, including biometric readers*”. That standard is supposed to cover products that are placed on the EU market with that functionality being its **core functionality**.

However, the **draft** currently under public enquiry **is extending the scope beyond that core functionality** and explicitly lists as examples “anti-intrusion systems” (meaning intrusion alarm systems) and “CCTV” (meaning Video Surveillance Systems). Moreover, the annexes explicitly list all the components of **fire detection systems, intrusion detection systems and video surveillance systems**.

This anomaly was detected in November last year and a discussion occurred in January between representatives of CLC/TC 79, CEN/TC 72, IEC/TC 79, CCMC and the European Commission (DG Connect) with the rapporteur¹ for that standard. The rapporteur committed to remove all references to fire detection systems, intrusion detection systems and video surveillance systems. This commitment did not actually produce the expected effect. Besides the fact that the legal basis for such an extended scope may be open to interpretation under the CRA framework, it poses a **risk of confusion in the market**: the current draft scope and technical content include products that are in the default category of the CRA and for which the manufacturer is supposed to have some freedom in choosing the standard for demonstrating conformity. If the standard is published with those contentious elements, the market could consider it to be “the state of the art” for alarm systems. Considering that this document has been drafted without giving to the relevant TC’s (CLC/TC 79, CEN/TC 72) the opportunity to provide their expertise, **this draft standard cannot be considered as state of the art for those products**. The fact that there are obvious errors in the language used to name the systems and products demonstrates a lack of expertise from alarm sector in the TC224 working group). **A confusing message to the market and inconsistent language should definitely be avoided**.

Here are two possibilities for expressing your objection:

- reach out to the national committee mirroring CEN/TC 224 in your country and pass them the comments proposed in the appendix of this approved recommendation;

¹ expert within the working group who takes the role of project leader for drafting a standard and reports to the TC and the joint CEN-CENELEC-ETSI coordination meetings on CRA standardisation.

- answer to the public consultation that should be publicly available on the website of your National Standardisation Body (e.g. [AFNOR](#) for France, [DIN](#) for Germany, [NBN](#) for Belgium etc.) and upload the comments proposed in the appendix of this approved recommendation (or variations from your side); that website should give you access to the draft standard.

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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DISCLAIMER

This document is intended solely for guidance of Euralarm members, and, where applicable, their members, on the state of affairs concerning its subject. Whilst every effort has been made to ensure its accuracy, readers should not rely upon its completeness or correctness, nor rely on it as legal interpretation. Euralarm will not be liable for the provision of any incorrect or incomplete information.

Note: The English version of this document, [GD-2026-010], is the approved Euralarm reference document.

MB/ NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
		1 Scope		te	<p>"The following non-exhaustive categories of products are within the scope of this document where their primary or supporting function relates to identity management, authentication, authorisation, or logical and physical access control to natural persons, legal persons, devices or systems."</p> <p>The CRA, its FAQ and draft guidance clearly refer to the core functionality of the product. The scope of the standard extends to supporting functions in the product. The harmonised standard should stick to the category as defined by the legislation and should not extend it. This could lead to confusion on what products legally belong to the category.</p> <p>Page 10 lists: <ul style="list-style-type: none"> • anti-intrusion systems; • CCTV; • smart lock." </p> <p>Such products do not belong to the category covered by this harmonised standard because their core functionality is different to the one building category #1. They should therefore not be listed as being in the scope of the standard, or they should be listed as being out of the scope.</p>	<p>Remove from the list of Logical and Physical Access management :</p> <ul style="list-style-type: none"> • anti-intrusion systems; • CCTV" <p>Add to the list of Product not in the scope of this document:</p> <ul style="list-style-type: none"> • Intruder & Hold Up Alarm System Products; • VSS. 	

		Annex A, Table A.1		te	<p>The table lists fire safety detection and details control panels, I/O modules, reporting panel, manual call points and electromagnetic locks. Such products do not belong to the category and should be removed from the table.</p> <p>The same table also lists "Corporate/Institution/Essential entities building protection and safety intrusion protection systems" and details different types of intrusion detectors, control panels, keypads and all other I&HAS components. Such products do not belong to the category and should be removed from the table.</p>	<p>Remove section "Corporate/Institution/Essential entities building protection and safety fire detection"</p> <ul style="list-style-type: none"> - Fire control panel (CMSI): central fire safety system - Input / output modules (for sensors, actuators, etc.) - Alarm reporting panel (for remote monitoring) - Manual call points (MCP) – red boxes for manual alarms - Electromagnetic locks for access control during a fire <p>Remove section Corporate/Institution/Essential entities building protection and safety intrusion protection systems :</p> <ul style="list-style-type: none"> - Motion detectors (PIR, microwave, dual technology) - Opening contacts (on doors/windows) - Glass break detectors - Shock or vibration detectors - Infrared barriers (interior or perimeter) - Seismic detectors (for safes, sensitive walls) - Intrusion alarm control panel - Control keypads - Remote controls or mobile apps - Monitoring or remote monitoring screens - Indoor and outdoor sirens - Flashing lights (strobes) - GSM/IP Modules for remote alert sending - Video surveillance systems (IP cameras, NVR/DVR recorders) 	
		Annex B, Table B.1		te	<p>The table lists software products for fire detection and intrusion detection products. Such software does not belong to the category and should be removed from the table, except where their core functionality is identity management and they are placed on the market separately from the final product.</p>	<p>Remove the following sections:</p> <ul style="list-style-type: none"> - Corporate/institution/essential entities building protection and safety fire detection - Corporate/institution/essential entities building protection and safety intrusion protection systems 	
		Annex G, Table G.1		te	<p>The table lists user interfaces for fire detection and intrusion detection products. Such interfaces do not belong to the category and should be removed from the table, except where their core functionality is identity management and they are placed on the market separately from the final product.</p>	<p>Remove the following sections:</p> <ul style="list-style-type: none"> - Corporate/Institution/Essential entities building protection and safety fire detection - Corporate/Institution/Essential entities building protection and safety intrusion protection systems 	
		Annex H, Table H.1		te	<p>The table lists protocols potentially used by fire detection and intrusion detection products. Such protocols do not belong to the category and should be removed from the table.</p>	<p>In 4th row, remove "and safety fire detection"</p> <p>In 5th row, remove "and safety intrusion protection systems"</p>	