

# Position Paper

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## Euralarm Position Paper on Regulation (EU) 2023/1542 Concerning batteries used in fire / life safety and security systems Version 2, 28 January 2026

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### Introduction

On 28<sup>th</sup> July 2023 Regulation (EU) 2023/1542 was published in the Official Journal, following signature by the European Parliament and Council, concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/EC.

Euralarm welcomes this Regulation as paving the way for a better, safer and more sustainable future.

Within the broad scope of the Regulation, batteries are categorized by intended design and use, not chemistry. Whilst “industrial use” is not formally defined in the Regulation, the definition for portable battery (5 kg or less) excludes batteries “designed specifically for industrial use”. Therefore, batteries of less than 5 kg may be classified industrial depending on their use and should not be generalized as portable. They are thus affected differently within the Regulation. This Position Paper is to aid Market Surveillance Authorities in interpreting the regulation in the context of fire safety, life safety and security systems.

It focuses on the batteries typically found in panels (control and indicating equipment and power supply units) or alarm transmitters (supervised premises transceiver). Systems can also comprise field devices, such as wireless detectors, which may contain batteries. Such field devices and their batteries are not considered here due to different applications and battery technologies.

### Systems using industrial batteries

Taking into account the statements in recital 15 of the EU Battery Regulation, a broad interpretation of the definition of industrial use comes into consideration. Not only batteries for industrial activities, but also those for communication infrastructure, for agricultural activities and for the production and distribution of energy fall under the term industrial battery.

Emergency power batteries are used to provide electrical energy in the event of a power failure and to pass it on to other devices. The corresponding batteries basically serve to distribute electrical energy that was previously stored in the battery. This activity in particular is understood in recital 15 as at least a partial application of the term industrial battery. Therefore, emergency power batteries that are used to supply safety and security systems are classified as industrial batteries, irrespective of weight.

According to the European WEEE Registers Network (EWRN)<sup>1</sup>, the wording “industrial uses” under the new Battery Regulation may also include “professional uses”. They explicitly list batteries for alarm systems in B2B as industrial. Such batteries are placed on the EU market by the battery manufacturer and purchased, installed and disposed by a professional service company, which makes it a B2B transaction regardless whether the battery protects an industrial, commercial or residential building. Considering also the intention of the legislator that batteries are

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<sup>1</sup> [“Batteries Regulation guidance document: Battery allocation to the five battery categories”](#), European WEEE Registers Network (EWRN), April 2025

properly collected and treated after their service:

- batteries that are professionally installed and disposed by qualified personnel in the context of a professional maintenance contract; and
- by a company having contracted with a recognised treatment operator for waste batteries

should be considered as industrial batteries.

For example, these batteries are the fire alarms panel's secondary power source and paired to a corresponding power supply unit per harmonised standard EN 54-4, product standard for power supply units used in fire detection and fire alarm systems, mandatory under the Construction Products Regulation (CPR).

The "Bundesministerium für Umwelt, Naturschutz, nukleare Sicherheit und Verbraucherschutz (BMUKN)" (German Federal Ministry for the Environment, Nature Conservation, Nuclear Safety and Consumer Protection) agrees with the interpretation of the EWRN.

## Ongoing support of existing systems

It is important to understand this Regulation not only affects new installations, but also the ongoing support and availability of the large Europe-wide installed base, designed and certified for a specific type of battery. To ensure reliability and safety, the maintenance service company must use the specified type of battery.

The typical life expectancy of a system is several decades, whereas the secondary power source batteries only a fraction of this, circa 4-7 years subject to use, conditions and prevailing law. Therefore, the ongoing availability of industrial batteries is paramount for existing system owners and the millions of safety and security systems installed across Europe.

## Conclusion

Installing batteries in fire, life safety and security panels used as secondary/standby power sources is categorised as industrial use. Therefore, these batteries would not be subject to the substance restrictions according to Article 6 paragraph 1 in conjunction with Annex I number 3 of the EU Battery Regulation. This categorization as industrial by design and intended use applies to all batteries, including those less than 5 kg. As such systems are professionally installed and maintained, personnel involved will duly process waste batteries accordingly.

The ongoing availability of industrial batteries for the continued support of critical systems in security, fire and life safety cannot be understated. The likely impact in a reduction in demand and production of the smaller batteries may affect price and availability but must not stop availability.

## 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 is the approved Euralarm reference document.*

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