

Euralarm calls for postponement of the applicability date of the RED DA

Zug, Switzerland, March 2023 – The European Commission has taken steps to protect its citizens from cyber-attacks and data breaches by establishing the Delegated Act ((EU) 2022/30) for the Radio Equipment Directive. Although CEN/CLC/JTC 13/WG 8 is achieving an unprecedented task with the extremely fast development of harmonised standards supporting the RED DA requirements, Euralarm feels that the applicability date of the RED DA (currently August 2024) will prevent the placing on the market of a significant number of existing and new products with a potential high impact on businesses and consumers and should therefore be postponed. Euralarm calls the European member states to work with the Commission on a better alignment between finalization of the standards and the applicability date.

Radio Equipment Directive (RED)

Manufacturers are increasingly taking advantage of new technology and the internet to improve their products; therefore, cyber security is now critically important. In order to ensure a safe and secure online environment, the European Commission has therefore established a number of new regulations. Among these are the proposal for a Cyber Resilience Act and the RED Delegated Act.

The latter has entered into force and covers via articles 3(3)(d), (e), and (f) specific kinds of radio equipment. Among these are internet-connected radio equipment, wearable technology or portable equipment with a radio function, equipment used to transfer money or virtual currency and child's toy with a radio function, or other equipment used for childcare. This addition will include wireless product for fire safety and security.

A working group of experts from across Europe (JTC13/WG8) is now developing harmonised standards to support the RED DA essential requirements. These harmonised standards will provide manufacturers with clear guidance on what is expected of them when it comes to meeting the requirements set out in the RED DA. In case of lack of standards cited in the Official Journal of the EU, the manufacturers have to go through a notified body to achieve the compliance assessment procedure.

Postponement needed

The applicability date of the RED DA is currently set at August 2024. Looking at the process Euralarm urges the European Commission and the Member States to take into consideration:

- That it is most likely that the harmonised standards won't be cited in time. Despite the progress so far it is expected that the harmonised standards will, in best case, be adopted by CEN-CENELEC 1 or 2 months before the applicability date.
- The assessment and citation process will generate an additional delay after the adoption. The unavailability of any HAS consultant to help JTC13/WG8 in the drafting process creates an additional uncertainty on the chance to get the adopted standards cited in the OJEU.
- Meanwhile the delay will prevent the manufacturers to proceed in due time with self-assessment of conformity to the new essential requirements.
- There are an insufficient number (4 concentrated in 2 countries) of notified bodies able to provide the necessary conformity assessment, therefore this does not constitute a viable route to compliance. Even though their number is expected to increase in the coming months, they will be overloaded by the demand meaning that most of the manufacturers won't have any route available during months to achieve the compliance assessment procedure.
- This will delay the market availability for every existing and new product falling under the RED DA causing manufacturers to stop placing on the EU market the products that are in scope awaiting the compliance assessment procedure to be completed. Among these products is a wide range of radio products for the business-to-business and business-to-consumer markets.
- Service companies will not be supplied with the products to be installed. It will be clear that a proper alignment of the applicability date of the RED DA on the one hand and the delivery time of the harmonised standards, including the time needed for assessment, testing and market delivery are of utmost importance. If not properly aligned it will have a negative impact on the economic activity in the Member States of the European Union for both business-to-business and business-to-consumer products.

Together with National Trade Associations Euralarm therefore strongly urges the Member States and the Commission to decide on postponement of the applicability date. A postponement of 9 months would re-instate the original sequence between adoption of the standards and applicability date set in the Standardisation Request M/585 but a delay of 12 to 18 months would increase the opportunity for the manufacturers to have their products assessed by a notified body.

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 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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