

Approved Recommendation

Euralarm recommends positive vote on FprEN 18031 series supporting essential requirements on cybersecurity and privacy of the Radio Equipment Directive – 29 May 2024

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

Voting recommendation

Approach your National mirror Committee of CEN/CLC/JTC 13 and support approval of the FprEN 18031 series of standards

Committee Internal Vote closing on 27 June 2024 (**check your national mirror committee deadline**)

The Delegated Act (EU) 2022/30 (as amended by (EU) 2023/2444) activates 3 new essential requirements of the Radio Equipment Directive 2014/53/EU regarding cybersecurity and privacy which will become applicable as from 1 August 2025. This Delegated Act has been followed by the Standardisation Request M/585 requesting CEN-CENELEC to produce 3 new harmonised standards intended to allow manufacturers benefiting of presumption of conformity to these new essential requirements.

Work Group 8 of CEN/CLC/JTC 13 achieved a tremendous work under huge time pressure and delivered the following 3 new standards:

- FprEN 18031-1 Common security requirements for radio equipment – Part 1: Internet connected radio equipment
- FprEN 18031-2 Common security requirements for radio equipment – Part 2: radio equipment processing data, namely Internet connected radio equipment, childcare radio equipment, toys radio equipment and wearable radio equipment
- FprEN 18031-3 Common security requirements for radio equipment – Part 3: Internet connected radio equipment processing virtual money or monetary value

These standards are currently under Formal Vote until 27 June 2024 and Euralarm TG Cybersecurity kindly encourage you to contact your respective national standardisation body to advocate for a positive vote on these three standards. A positive vote would be required in view of the approval for citation of these by the European Commission. Here are some arguments supporting such a positive vote:

- We support under the NLF framework to deliver safer and harmonized products on the EU market allowing free movement of goods. NLF principles are a cornerstone of the Single Market, based on Harmonized standards:
 - o Having cited harmonized standards will benefit the whole value chain of the Single market, from consumers to manufacturers, including market surveillance authorities and notified bodies, thanks to a common standard reference.
 - o The work of the JTC 13 WG 8 was done in close cooperation with European Commission's representatives to seek guidance, support and to end-up with standards written to fulfil in the best possible way EC expectations.
 - o Having cited harmonised standards for the RED DA will reaffirm the commitment of member states and European institutions to the process of harmonised standards, a long standing, mature and recognised European process where the inputs of a large range of stakeholders are central.

- Since the draft standardisation request on the RED DA, CEN-CENELEC experts in JTC 13 WG 8 have put tremendous amount of work in the development of harmonized standards, applicable for the RED DA and looking forward to the CRA. This work needs to be valorised and recognised.
- The work of the CEN-CENELEC WG 8 has found a balance between different sources of inspirations, such as EN IEC 62443 and ETSI EN 303 645, which are mapped into the FprEN 18031 series, and ended up with a very clear structure based on protection mechanisms.
- It is recognised by all parties that the certainty is an intrinsic difficulty when dealing with cybersecurity (RED DA & CRA) or Artificial Intelligence. We urge to consider differently the assessment approach, compared to safety or EMC aspects, due to the specificities of cybersecurity and artificial intelligence fields. In this approach JTC 13 WG 8 focused in adjusting the 3 draft standards to become the transversal reference in the spirit of a necessary learning curve for the whole European single market. E.g. this was the goal with the introduction of decision trees, to support the best guidance to get the most reproducible assessment results.
- Without harmonised standards, many more manufacturers will need notified bodies (NBs) to certify their products (no other possibility of self-assessment) and given the limited number of NBs currently available it is likely that there will be bottle necks with companies having to wait longer time to get their products on the market.
- Having cited harmonized standards for the RED DA will set a strong precedent for the standardisation process on the CRA, re-emphasizing the importance of cited harmonized standards in the regulatory and conformity European landscape, ensuring business continuity and efficient ways to demonstrate conformity to the RED DA and CRA.
 - o The cited harmonised standards need to remain the reference for manufacturers to walk the learning curve of cybersecurity assessment for RED DA and the future CRA.
 - o The use of cited harmonised standards for the RED DA is the first and necessary step that can be improved, if needed, after a first experience is matured.

TG Cybersecurity would like to thank the voters for taking time to go through this recommendation and for considering it when providing their vote through their respective national mirror committee.

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-2024-005], is the approved Euralarm reference document.