

Cybersecurity:

Legal challenges and ARGE's engagement

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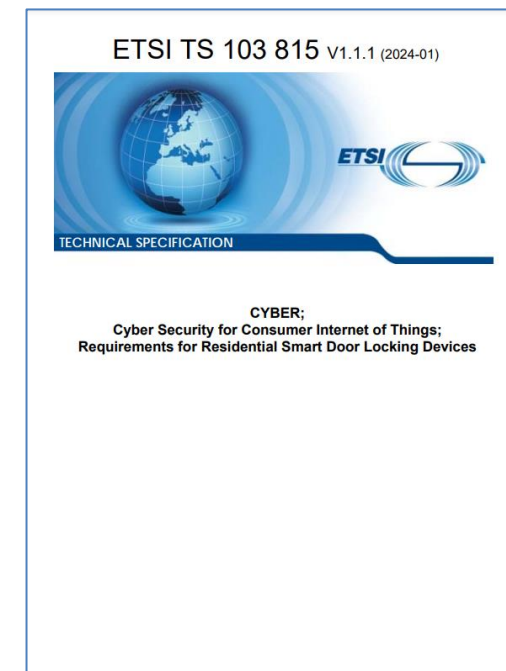
ARGE Conference 2025

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Overview

- Cyber security new EU product regulations mainly consist in:
 - RED – Radio Equipment Directive - Delegated Act
 - CRA – Cyber Resilience Act –
- **ARGE had contributed to the voluntary standard ETSI TS 103 815 : Cyber Security for Consumer Internet of Things; Requirements for Residential Smart Door Locking Devices – published in January 2024**
 - Vertical Technical Specification, based on the ETSI/EN 303645 - Cyber Security for Consumer Internet of Things: Baseline Requirements -



RED Delegated Act

- **Issued on 29 October 2021**, strengthening the cybersecurity requirements of RED, article 3.3:
 - (d) : to ensure network protection
 - (e) : to ensure safeguards for the protection of personal data and privacy
 - (f) : to ensure protection from fraud

- **Applicable by Manufacturers from 1 August 2025**

RED Delegated Act

- **3 harmonised standards** to precise the product requirements in more details than this framework delegated act have been published in August 2024 :
- **EN 18031-1** : Common security requirements for radio equipment - Part 1: Internet connected radio equipment
- **EN 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
- **EN 18031-3** (*non applicable to us*) : Common security requirements for radio equipment - Part 3: Internet connected radio equipment processing virtual money or monetary value

CRA –Cyber Resilience Act

- **EU horizontal Legislation** on all products with digital elements that can have a direct or indirect data connection to a device or network
- **This regulation (EU) 2024/2847** , published on 23 October 2024, will be applicable :
 - In September 2026 for vulnerabilities declarations
 - In December 2027 for all the other requirements
- CRA will be based on **harmonized standards**, currently under development within the CEN/CENELEC .
- **Two categories of products:**
 - **Default non-critical products:** hard drives, smart home assistants or connected toys, ...
 - **Critical products:**
 - **Class I, lower risk** : e.g. Home automation systems, including smart home servers and virtual assistants; Private security devices, including smart door locks, cameras and alarm systems; ...
 - **Class II, higher risk** : e.g. Smartcards, smartcard readers, biometric readers, and tokens; ...

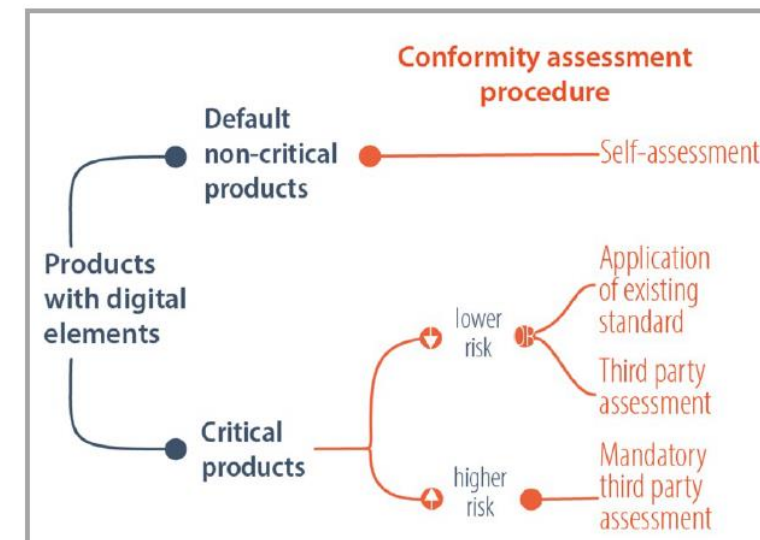


CRA –Cyber Resilience Act

➤ Main provisions:

- Risk assessment
- Cybersecurity by design and by default
- Essential cybersecurity and vulnerability handling requirements, including reporting obligations to the ENISA within 24 hours
- Conformity assessment and compliance
- CE marking, CRA to be mentioned in the DoC

➤ Different conformity assessment procedures according to the category of products and their risks



CRA –Cyber Resilience Act

- Out of the 41 harmonized standards to be developed, mainly 3 standards of interest for our products :
- **Category 41** (CEN/TC 224): **smartcards** or similar devices, including secure elements
- **Category 16** (CEN/TC 224 WG 17): **identity management systems** and privileged access management software and hardware, including authentication and access control readers, including biometric readers
- **Category 32** (CEN-CLC/JTC 13 WG 9) : **smart home products** with security functionalities, including smart door locks, security cameras, baby monitoring systems and alarm systems
 - ETSI EN 304 632
 - Thanks to our ETSI Membership, ARGE contributes to this standard, with Andreas Elvstam Cantner, Security Engineer Yale ASSA ABLOY EMEIA.



CYBER; CRA; Essential cybersecurity requirements for smart home products with security functionalities

 The guidance text (in purple) shall be removed when no longer needed.

Should you need a step-by-step guide for drafting an ETSI deliverable, please consult the "Principles for Drafting ETSI Deliverables" document. [Q&A you may contact us at edit@etsi.org](mailto:edit@etsi.org)

The technical work is just starting.

Work Items have been opened and scopes are currently under validation

Next steps

- **ARGE will call for candidates withing Members to be part of the WG Cybersecurity**
- **ARGE will then be able to influence and follow-up the relevant standards about our products**



Take away from this presentation ...

- ➔ RED Delegated Act is applicable since August 2025
- ➔ CRA requirements have to be precised by new harmonized standards
- ➔ ARGE will call soon for candidates to be part of ARGE WG Cyber



Thank you!

Any questions and/or comments?