

Proposal for amendments to draft UN Regulation on Cybersecurity

(GRVA-05-05-Rev.1)

Proposed changes to the current text of the regulation are marked in **bold** for new text.

I. Proposal

Paragraph 7.3.4., amend to read:

“7.3.4. The vehicle manufacturer shall protect ~~critical elements of~~ the vehicle type against risks identified in the vehicle manufacturer’s risk assessment. Proportionate mitigations shall be implemented to protect ~~such elements the~~ **vehicle type**. The mitigations implemented shall include all mitigations referred to in Annex 5, Part B and C which are relevant for the risks identified. However, if a mitigation referred to in Annex 5, Part B or C, is not relevant or not sufficient, the vehicle manufacturer shall ensure that another appropriate mitigation is implemented.

In particular, the vehicle manufacturer shall ensure that another appropriate mitigation is implemented if a mitigation measure referred to in Annex 5, Part B or C is technically not feasible because the vehicle type was fully developed latest until [48 month] after entry into force of this Regulation. The respective assessment of the technical feasibility shall be provided by the manufacturer to the approval authority.”

II. Justification

The proposal replaces the protection of critical elements with the protection of the vehicle type in general. This ensures that a critical element can be secured by security mechanisms in other elements of the vehicle type. This clarifies that secure gateways can be used to shield parts of an E/E architecture which contain critical elements.

Further, the proposal introduces a transitional period for the obligation to implement the mitigation measures of Annex 5, Part B and C. During this transitional period, the manufacturer can introduce alternative appropriate mitigation measures on the basis of technical feasibility.