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.

1. 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.**”

1. 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.