

Proposal for amendments to UN Regulation No. 155 (Cyber Security and Cyber Security Management System)

The additions and deletions are shown in **bold** text to facilitate identification of these proposed changes within the existing Regulation.

I. Proposal

Paragraph 7.3.1., amend to read:

“7.3.1. The manufacturer shall have a valid Certificate of Compliance for the Cyber Security Management System relevant to the vehicle type being approved.

However, for type approvals **prior to first issued and approvals of their extensions before 1 July 2024** ~~and for extensions thereof~~, if the vehicle manufacturer can demonstrate that the vehicle type could not be developed in compliance with the CSMS, then the vehicle manufacturer shall demonstrate that cyber security was adequately considered during the development phase of the vehicle type concerned.”

Paragraph 7.3.4., amend to read:

“7.3.4. The vehicle manufacturer shall protect the vehicle type against risks identified in the vehicle manufacturer’s risk assessment. Proportionate mitigations shall be implemented to protect 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 for the risk identified, the vehicle manufacturer shall ensure that another appropriate mitigation is implemented.

In particular, for type approvals **prior to first issued and approvals of their extensions before 1 July 2024** ~~and for extensions thereof~~, 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. The respective assessment of the technical feasibility shall be provided by the manufacturer to the approval authority.”

II. Justification

The amendment described in the document (GRVA-10-12e.docx) is unclear whether the cases below can be clearly distinctified. Case 2 shall be avoided because the approval of such extensions has to be confirmed under the CSMS complied with UN R155.

