



Economic Commission for Europe**Inland Transport Committee****World Forum for Harmonization of Vehicle Regulations****Working Party on Automated/Autonomous and Connected Vehicles****Fifteenth session**

Geneva, 23-27 January 2023

Item 5(a) of the provisional agenda

Connected Vehicles:**Cyber security and data protection****Proposal for amendments to the Interpretation Document for
UN Regulation No. 155 (Cyber security and cyber security
management system)****Submitted by the expert from France***

The text reproduced below was prepared by the expert from France. The proposal aims to introduce an explanation clarifying the possibility for Approval Authorities to recognise Certificates of Compliance for Cyber Security Management Systems (CSMS) issued by the Approval Authority of another Contracting Party. The modifications to the existing text of the Regulation are marked in bold for new or strikethrough for deleted characters.

* In accordance with the programme of work of the Inland Transport Committee for 2023 as outlined in proposed programme budget for 2023 (A/77/6 (part V sect. 20) para 20.6), the World Forum will develop, harmonize and update UN Regulations in order to enhance the performance of vehicles. The present document is submitted in conformity with that mandate.



I. Proposal

Section K, amend to read:

- “6. Certificate of Compliance for Cyber Security Management System
- 6.1. Contracting Parties shall appoint an Approval Authority to carry out the assessment of the manufacturer and to issue a Certificate of Compliance for CSMS.

Explanation of the requirement

When carrying out the assessment of the manufacturer, an Approval Authority may recognise, in whole or in part, a Certificate of Compliance for CSMS issued by the Approval Authority of another Contracting Party. This may be done via an agreement between Approval Authorities including, for instance, conditions for the recognition. Approval Authorities recognising a Certificate remain fully responsible for all relevant type approvals granted thereafter, including ensuring the validity of the Certificate of Compliance for CSMS.

When partly recognising a Certificate of Compliance for CSMS, Approval Authorities shall issue their own separate Certificate for which they are responsible, and which shall be the only one referenced on communication forms for all relevant type approvals granted thereafter.”

II. Justification

1. Certificates of Compliance for CSMS are not a communication file as defined by the 1958 Agreement. Therefore, unless a specific agreement between Approval Authorities exists, a manufacturer looking to apply for type approval in several countries needs to hold a Certificate issued by each Authority, even if the CSMS itself is identical. This would imply auditing the same processes several times, having limited benefits when only some of these processes are useful for the subsequent type approval, as it is often the case in partnerships between manufacturers.

2. The Workshop for the Implementation of UN Regulation No. 155 extensively discussed this issue and the participating experts agreed that Contracting Parties may recognise Certificates of Compliance for CSMS issued by the Authorities of other Contracting Parties, as reported at the 14th session of GRVA in informal document GRVA-14-46. This proposal aims to clarify the interpretation document reflecting the current understanding as agreed upon by the Workshop participants.
