

Issues identified in connection with the work of TF-CS/OTA

During its work the Task Force has identified issues, which need further consideration. The main issue is about how to deal with requirements related to the post-production phase.

As a measure, the task force has implemented obligations within the draft Regulation on Cyber Security, which mandates that the vehicle manufacturer has processes and an organization in place, a so-called Cyber Security Management System, which needs to be certified, to ensure cyber security during the development phase, production phase and post-production phase, therefore over the lifetime of the vehicle.

Furthermore, in the draft Regulation are mandatory requirements that the vehicle manufacturer has to react adequately to new and evolving cyber threats. Related processes to ensure this are checked at the point of certification.

Even though the post-production phase is covered within the draft Regulation to some extent, the Regulation will not be able to address all implications to ensure cyber security over the entire post-production phase, especially in cases where the approval of a vehicle type is no longer of relevance, e.g. a vehicle type is no longer in production (=> “Production definitely discontinued”).

In such cases, today, national or regional legislation is addressing this issue of post-production, e.g. legislation addressing recalls, serviceability (e.g. how long to provide spare parts, etc.).

WP.29 may wish to consider further, whether to harmonize such processes/legislation on UN level or if this should be left open to the national jurisdictions.