Submitted by the experts from
Spain

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Agenda item x

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.

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.**~~

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.

The vehicle manufacturer shall define specific security requirements for the vehicle type according to results of the risk assessment that meets Annex 5.

Definition of security requirements for the vehicle type, will be done following a structured methodology for definition of high-assurance security requirements covering at least the following requirement areas:

- **Requirements for security functions implemented in the product.**
- **Requirements for independent vulnerability analysis and penetration testing.**

I. Justification

Amendments for paragraph 7.3.4 introduce the need to define security requirements for the vehicle type.

This definition will guide technical services and approval authorities to identify the targets of evaluation, to provide a high level of security assurance. ANNEX 5 implementation by the manufacturer will be evaluated against its security requirement definition. Type approval according to this UN regulation will be granted only if the security requirements are appropriate and if the mitigation implementation fulfils them.