



# Cyber Security Requirements – UK EU USA

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# Agenda

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Cyber for UK

Cyber for EU

Cyber for USA

# UK Cyber Security

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# UK Cyber Security

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- PSTI (Cyber Security) for UK
  - Product Security and Telecoms Infrastructure
    - <https://www.gov.uk/government/publications/the-uk-product-security-and-telecommunications-infrastructure-product-security-regime>
  - Applies to connected consumer IoT into UK
  - **From 29 April 2024**
    - Wireless and wired
    - Internet connected
    - Networked



# UK Cyber Security

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- Cyber Security for UK (PSTI):
  - Based on selected parts of EN 303 645
    - Unique password for each unit
    - Process for user to inform manufacturer about cyber security issue
    - Manufacturer procedure to fix security issue



# UK Cyber Security

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- Cyber Security for UK (PSTI):
  - Statement of compliance with each product
    - Manufacturer to sign the statement (like DoC)
    - Manufacturer to state product support period
  - All connected devices entering the UK
    - Including existing models



# UK Cyber Security

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- Cyber Security for UK (PSTI):
  - Not linked to UKCA (or CE) marking
  - Very different to EU Cyber requirements



# The European Union (EU)

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# EU RED

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- Radio Equipment Directive
  - RED
- Directive 2014/53/EU
- Radio equipment into the EU
  - Radio / wireless



# EU RED

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- ✓ Technical assessment of equipment to essential requirements
- ✓ Authorization route: Declaration of Conformity (DoC)

# Harmonised Standards

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Harmonised  
Test Standards  
Listed on  
RED OJEU

Published by the standards group  
Accepted by the EU Commission

Official Journal of Harmonised Standards  
“Presumption of Conformity” (PoC)

No Harmonised Standard may require  
Notified Body review and certificate  
(Radio and ‘Other’)

# Article 3: RED Assessment Scope

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**Product  
Safety**

Article 3.1a

**EMC  
Performance**

Article 3.1b

**Radio  
Performance**

Article 3.2

**Other  
Categories**

Article 3.3

**Common  
Charger**

Article 3.4

# RED Article 3(3)

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- Delegated Regulation (EU) 2022/30
  - Published 12 January 2022
    - Enacting RED Article 3.3(d), 3.3(e), 3.3(f)
  - Applies from 1 August 2025
  - All radio products entering the EU market
    - Including existing models



# RED Article 3(3)

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- Article 3(3)
  - 3(3)(d) – Connection to networks
  - 3(3)(e) – Personal data and privacy of user
  - 3(3)(f) – Protection from fraud

# RED Article 3(3)

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- Harmonised Standards in progress:
  - Expected around June-August 2024
    - EN 18031-1 (Article 3(3)(d) – Connection to networks)
    - EN 18031-2 (Article 3(3)(e) – Personal data and privacy)
    - EN 18031-3 (Article 3(3)(f) – Protection from fraud)
  - Drafts available to committee members



# RED Article 3(3)

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- Harmonised Standards in progress:
  - In case they are not ready...
  - Notified Body EU-TEC from 1 August 2025





# RED Article 3(3)

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- Cyber Security for EU:
  - Part of the CE marking
    - Included in manufacturer's DoC to RED
  - Very different to UK PSTI requirements



# EU Future?

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- Cyber Resilience Act
  - CRA
- All digital equipment and software
  - Wireless and Wired
  - Hardware and Applications
- Expect published in 2024
  - Expect in force 2027



# EU CRA

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- Cyber Resilience Act
  - Expected to 'repeal' RED Cyber
    - Articles 3.3(d), 3.3(e), 3.3(f)
  - CRA tests not known yet
    - Hope to be similar to RED requirements





# USA Cyber

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- Cyber Labelling Program
  - Published on 25 March 2024
  - Into effect from 24 April 2024
- **Voluntary scheme**
  - For wireless consumer IoT products



# USA Cyber

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- Cyber Labelling Program
  - Logo and QR code for compliant products
  - QR code informs about support period and security details



# USA Cyber

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- Cyber Labelling Program
  - Detailed in FCC 47 CFR Part 8
  - “Test” by accredited labs
  - “Certification” by accredited body
    - (CLA = Cyber Label Administrator)



# USA Cyber

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- Cyber Labelling Program
  - Test requirements not defined yet
  - Recommendations in place:
    - <https://www.nist.gov/itl/executive-order-14028-improving-nations-cybersecurity/cybersecurity-labeling-consumers-0>
    - <https://nvlpubs.nist.gov/nistpubs/CSWP/NIST.CSWP.02042022-2.pdf>
    - <https://nvlpubs.nist.gov/nistpubs/CSWP/NIST.CSWP.02042022-1.pdf>





# Questions

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