



## GUIDANCE ON THE APPLICATION OF THE HARMONISED STANDARDS SERIES EN 18031:2024 IN SUPPORT OF COMMISSION DELEGATED REGULATION 2022/30

The harmonised standards EN 18031-1:2024, EN 18032-2:2024 and EN 18033-3:2024 are cited, with some restrictions, in the Official Journal, in support of the essential requirements set out in Article 3 (3) (d), (e) and (f) of the Radio Equipment Directive 2014/53/EU (RED), via Commission Implementing Decision (EU) 2022/2191. These essential requirements - rendered applicable through Commission Delegated Regulation 2022/30 (the delegated act of the Radio Equipment Directive, RED, on cybersecurity) - will apply as of 1 August 2025 to classes or categories of radio equipment specified in that Delegated Regulation. The purpose of this document is to provide guidance on the application of the harmonised standards, taking into account the restrictions.

Important notice: This document is intended only as a guidance document. The binding interpretation of European Union (EU) legislation is the exclusive competence of the Court of Justice of the EU.

**RESTRICTION 1. The sections named ‘rationale’ and ‘guidance’ do not confer a presumption of conformity with the essential requirement set out in Article 3(3), first subparagraph, point (d), (e) and (f), of Directive 2014/53/EU.**

### Which harmonised standards this restriction is applied to?

The restriction is applied to the three harmonised standards, EN 18031-1:2024, EN 18031-2:2024 and EN 18031-3:2024.

### What is the rationale of the restriction?

The sections named ‘rationale’ aim to provide a justification for the need to address certain risks. The sections named ‘guidance’ include examples and considerations on the possibilities to implement certain mitigation measures. Neither of the two afore mentioned sections set out specifications.

### Does the manufacturer need to undertake a third-party conformity assessment as regards this restriction?

No. The aim of the restriction is to clarify that those sections are of pure informative nature, and therefore they are not linked to presumption of conformity.

**RESTRICTION 2. This harmonised standard does not confer a presumption of conformity with Article 3(3), first subparagraph, point (d), (e) and (f), of Directive 2014/53/EU if, by applying its clauses 6.2.5.1 and 6.2.5.2, the user is allowed not to set and use any password.**

### Which harmonised standards this restriction is applied to?

The restriction is applied to the three harmonised standards, EN 18031-1:2024, EN 18032-2:2024 and EN 18033-3:2024.

## What is the rationale of the restriction?

Clauses 6.2.5.1 and 6.2.5.2 of the three harmonised standards deal with default passwords. Those clauses offer manufacturers the possibility to allow a user not to set or use any password. It is considered that, if this option is implemented, the relevant authentication risks will not be properly addressed and therefore conformity with the essential requirements set out in Articles 3(3)(d), (e) and (f), of the RED would not be ensured.

## Does the manufacturer need to undertake a third-party conformity assessment as regards this restriction?

No if the manufacturer disregards the possibility of clauses 6.2.5.1 and 6.2.5.2 of allowing a user not to set any password.

**RESTRICTION 3. For the classes or categories of radio equipment covered by clauses 6.1.3, 6.1.4, 6.1.5 or 6.1.6 of this harmonised standard, this harmonised standard does not confer a presumption of conformity with the essential requirement set out in Article 3(3), first subparagraph, point (e), of Directive 2014/53/EU if, by applying its clauses 6.1.3.4.2, 6.1.4.4.2, 6.1.5.4.2 and 6.1.6.4.2, parental or guardian access control is not ensured.**

## Which harmonised standards this restriction is applied to?

The restriction is applied to harmonised standard EN 18032-2:2024.

## What is the rationale of the restriction?

Clauses 6.1.3, 6.1.4, 6.1.5 and 6.1.6 of harmonised standard EN 18031-2:2024 include specifications on access control mechanisms for toy radio equipment and for childcare radio equipment. More specifically, the implementation categories described under the subsections ‘assessment criteria’ are the following: role-based access control, discretionary access control, mandatory access control or others. Certain of these categories might not be compatible with parental or guardian control. In such a case, it is considered that, if parental or guardian control is not implemented, the relevant authentication risks will not be addressed and, therefore, conformity with the essential requirement set out in Article 3(3)(e) of the RED would not be ensured.

## Does the manufacturer need to undertake a third-party conformity assessment as regards this restriction?

No, if the manufacturer disregards the possibility of clauses 6.1.3, 6.1.4, 6.1.5 of not implementing parental or guardian control.

**RESTRICTION 4. As regards the assessment criteria set out in clause 6.3.2.4 of this harmonised standard, this harmonised standard does not confer a presumption of conformity with the essential requirement set out in Article 3(3), first subparagraph, point (f), of Directive 2014/53/EU**

## Which harmonised standards this restriction is applied to?

The restriction is applied to harmonised standard EN 18032-3:2024.

## What is the rationale of the restriction?

Clause 6.3.2.4 of harmonised standard EN 18031-3:2024 includes assessment criteria for secure updates. Four different implementation categories are laid down, based on digital signatures, secure

communication mechanisms, access control mechanisms or others. None of the methods alone are sufficient for the treatment of financial assets. It is considered that the assessment criteria do not properly address the relevant authentication risks and cannot therefore ensure conformity with the essential requirement set out in Article 3(3),(f), of the RED.

### **Does the manufacturer need to undertake a third-party conformity assessment as regards this restriction?**

A manufacturer of products covered by harmonised standard EN 18032-3:2024 to which clause 6.3.2.4 applies does not benefit from presumption of conformity regardless of the design of the product. A third-party conformity assessment is mandatory.

## **OTHER QUESTIONS**

### **Is self-assessment (module A) allowed to demonstrate conformity with the essential requirements set out in Article 3(3) (d), (e) and (f) (Commission Delegated Regulation 2022/30)?**

Self-assessment is allowed only if the relevant harmonised standards of the EN 18031:2024 family is applied to the product and is not affected by the restrictions applied and described above.

### **Can a manufacturer perform a third-party conformity assessment on a voluntary basis?**

Yes, this is always a possibility. The applicable conformity assessment procedure(s) applicable for the purposes of demonstrating compliance with the essential requirements of the RED are laid down in Article 17 of the RED (for more details, see section 2.6.b of the Guide to the Radio Equipment Directive).

### **Which notified bodies are available?**

The RED notified bodies are listed on this [link](#). Only the notified bodies specifically competent on cybersecurity matters under the RED are entitled to issue EU-type certificates under conformity procedures in accordance to the RED (Commission Delegated Regulation 2022/30). On NANDO website, notified bodies can be filtered by the relevant essential requirement. Articles 3.3.d/e/f should be selected to check the approved notified bodies competent on the essential requirements (afore mentioned Delegated Regulation). As of the date the document is issued, 24 notified bodies are competent for cybersecurity assessments under the RED.

All products

Article 3.1.a

Article 3.1.b

Article 3.2

Article 3.3.a

Article 3.3.d

**Article 3.3.e**

Article 3.3.f

Article 3.3.g NOT applied in conjunction with the Commission Decisions adopted under the R&TTED

Article 3.3.g applied in conjunction with the Commission Decisions adopted under the R&TTED

Article 3.4

Radio equipment

**Does the Commission advise on the application of the harmonised standards to specific products?**

No. This task constitutes a responsibility of the manufacturer.