



cecapi

European Committee of Electrical Installation Equipment Manufacturers
Comité Européen des Constructeurs d'Appareillage Electrique d'Installation

RED DR - Guidance on one restriction mentioned in (EU) 2025/138

- 4 restrictions are mentioned in the Commission Implementing Decision (EU) 2025/138.
- This guidance document is about the **2nd restriction** present **in the official text**, in **recital 6**:

« (6) Clauses 6.2.5.1 and 6.2.5.2 of harmonised standards EN 18031-1:2024, EN 18031-2:2024 and EN 18031-3:2024 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 Article 3(3), first subparagraph, points (d), (e) and (f), of Directive 2014/53/EU would not be ensured.»

- In the rest of this document, the restriction is called “**restriction #2**”

RED DR - Guidance on restriction #2

- Based on the listed EN 18031-1, -2 & -3 standards, manufacturers have the possibility **under some conditions** to perform products **self-assessment**.
 - As a side text to the listing, **restriction #2 describes conditions** where the involvement of Notified Bodies is mandatory and where self-assessment is allowed.
 - However, questions were raised showing that further clarification could be useful to decided when self-assessment can be performed and when Notified Bodies must be involved.
- To have a guidance that helps in the decision, and which can be used by all European stakeholders, an **initiative** was set with a flowchart **aiming** to bring some **useful guidance**.

RED DR - Guidance about the allowance to perform a product self-assessment as indicated in the restriction #2

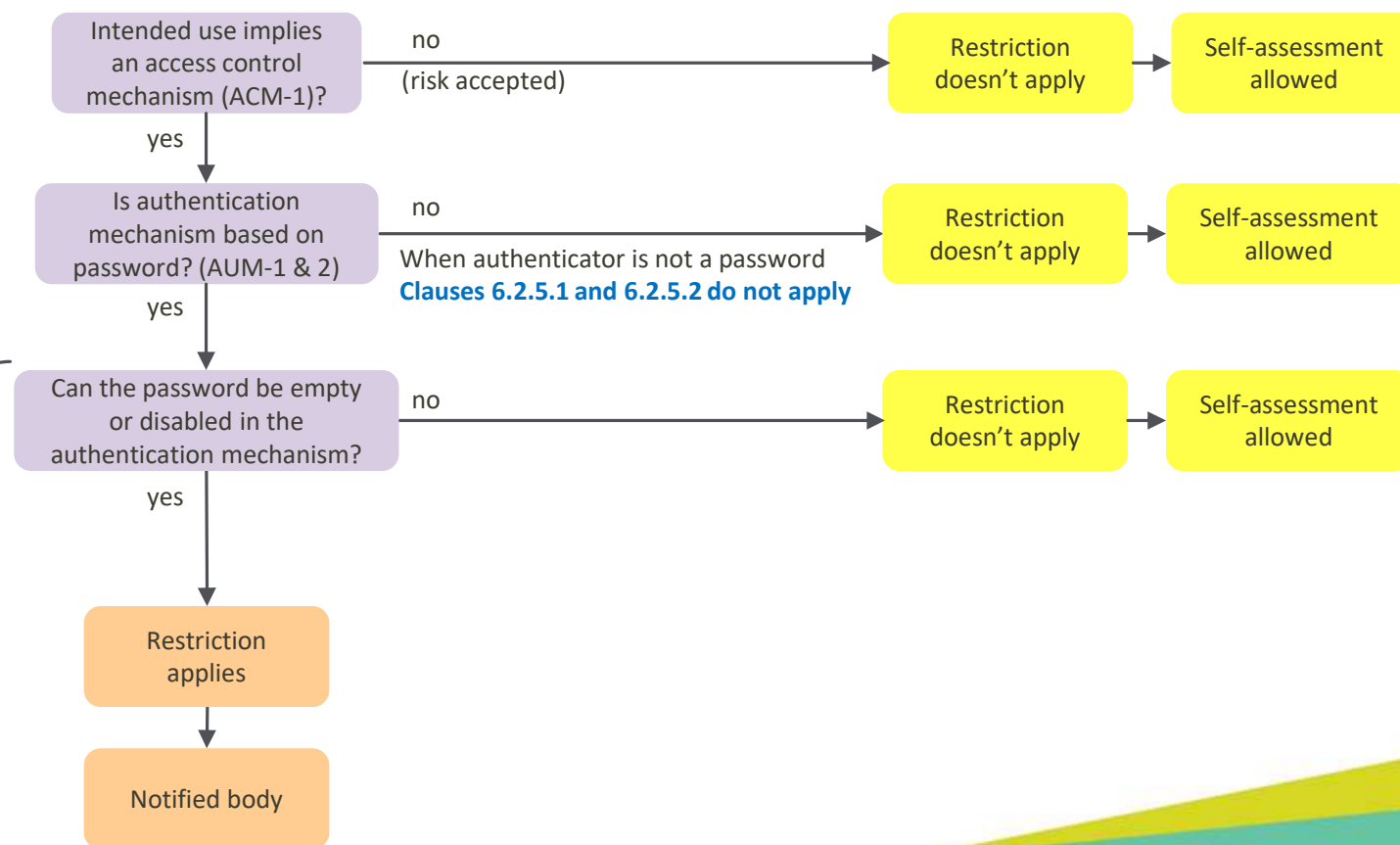
Note: A cybersecurity risk assessment is a pre-requisite

Reference text: OJ_L_202500138_EN_TXT
recital 6

Clauses 6.2.5.1 and 6.2.5.2 of harmonised standards EN 18031-1:2024, EN 18031-2:2024 and EN 18031-3:2024 deal with default passwords.

Those clauses (6.2.5.1 and 6.2.5.2) offer manufacturers the possibility to allow a user not to set or use any password.

It ends up with the allowance (or not) to perform a self-assessment



The intention

- Our target is to have a document:
 - **known** by as many as possible European stakeholders,
 - that would have received hopefully **no opposition**,
 - that can serve as a **reference** for decision in the assessment of products.
- It would make **Compliance Technical Files stronger** in case of audit by **market surveillance**.
- It would tend to orientate all stakeholders for adoption of this flowchart (with the same decisions) for the sake of **common understanding**.

Action plan

1 - CECAPI SC is kindly asked to approve this initiative and flowchart.

2 – CECAPI Cyber TF with support from Secretariat will circulate it to other organisations (any proposal is welcome) looking for consensus.

Here below is a non-exhaustive list:

- **DIGITALEUROPE representatives**
- **TIC-Council** (International Testing & Certification association)
- **ETICS** (European Testing & Certification association)
- **ORGALIM TF Cyber**
- **Expert Group on Radio Equipment (EG RE)**
- **Any National Association where manufacturers, market surveillance and other representatives are involved**

any CECAPI member having the possibility to share this presentation with other Associations is encouraged to do so, to get support and/or comments.



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Thank you for the attention