

The background features abstract, overlapping green shapes in various shades of green, creating a modern and dynamic design. The shapes include a large dark green area at the top right, a lighter green curved shape on the left, and a dark green triangular shape at the bottom right.

Guidance for RED-DA Restrictions in EN 18031 Harmonized Standards



Table of Contents

- 01** Introduction
- 02** Guidance
- 03** Key Restrictions in EN 18031 HS
- 04** New Certification Process
- 05** References



1

Introduction

Significant regulatory changes have been made and they impact the certification of radio equipment under the **Radio Equipment Directive (RED) 2014/53/EU**, specifically regarding the **essential cybersecurity requirements outlined in Articles 3(3)(d), 3(3)(e), and 3(3)(f)**.

As of **January 30, 2025**, the **Commission Implementing Decision (EU) 2025/138** has been published, modifying the applicability of **EN 18031-1, EN 18031-2, and EN 18031-3**. These standards have been harmonized **with restrictions**, meaning that they do not automatically confer a presumption of conformity in certain areas. As a result, **manufacturers must now provide additional verification** to ensure full compliance.

2

Guidance

If your devices fall under the scope of Articles 3(3)(d), (e), or (f), the following changes apply.

Notified Body Involvement Has Always Been Required.

Before: There was no harmonized standard for these cybersecurity requirements, meaning that manufacturers already needed a Notified Body (NB) assessment to demonstrate compliance.



Now: EN 18031 provides a structured framework, but with specific restrictions on some clauses, requiring manufacturers to take additional measures in certain cases.



3

Key Restrictions in EN 18031 HS

EN 18031-1:2024

Internet-connected radio equipment.

Clause 6.2.5.1 and 6.2.5.2 Password authentication requirements

If the device allows users **not to set or use a password**, it does not meet the essential requirement under **Article 3(3)(d)** (network protection).

Notified Body is not required if:



The product fully complies with EN 18031-1 without relying on restricted clauses (password authentication).

Notified Body is required if:



The product allows operation without password authentication.



EN 18031-2:2024

Data-processing radio equipment,
including toys and childcare devices.

Clause 6.1.3, 6.1.4, and 6.1.6 Parental/guardian access controls

If parental control is **not properly implemented**, it does not meet the essential requirement under **Article 3(3)(e)** (data and privacy protection).

Clause 6.2.5.1 and 6.2.5.2 Password authentication requirements

If the device allows users **not to set or use a password**, it does not meet the essential requirement under **Article 3(3)(e)** (data and privacy protection).

Notified Body is not required if:



The product fully complies with EN 18031-2 without relying on restricted clauses (password authentication and parental control)

Notified Body is required if:



**The product allows operation without password authentication.
No parental control is implemented for childcare devices and toys.**



EN 18031-3:2024

Radio equipment processing virtual money or monetary value.

Clause 6.2.5.1 and 6.2.5.2 Password authentication requirements

If the device allows operation **without a password**, it does not meet the essential requirement under **Article 3(3)(f)** (fraud protection).

Clause 6.3.2.4 Secure update mechanisms for financial transactions

Different implementation categories are laid down, based on digital signatures, secure communication mechanisms, access control mechanisms or others, but **none of the methods alone is sufficient for a product that handle financial assets**.

If multiple layers of security are not implemented, the product does not meet the essential requirement under **Article 3(3)(f)**.

Notified Body is required in all cases for Article 3(3)(f)



4

New Certification Process

All products subject to Articles 3(3)(d), 3(3)(e), or 3(3)(F) must follow this process:

If the product fully complies with EN 18031 (without relying on restricted clauses)

- ✓ Notified Body involvement is not required.
- ✓ The manufacturer can submit the compliance report using EN 18031 as the harmonized standard.
- ✓ The CE marking process proceeds as usual.

If the product does not fully comply with EN 18031 (due to restricted clauses)

Notified Body involvement is required to review:

- ⊗ Additional security measures taken to mitigate cybersecurity risks.
- ⊗ Alternative implementations that replace restricted clauses.
- ⊗ If necessary, further security testing and risk assessments.

Steps for Certification:

1 Testing in Accredited Laboratories

Conduct testing according to EN 18031 while identifying restricted clauses.

Include additional security tests for authentication, parental control, and secure updates.

2 Manufacturer's Cybersecurity Risk Assessment

Document additional security measures beyond EN 18031.

3 Review by a Notified Body (NB) (if applicable)

Submit technical documentation (TD/TCF) to an NB.

The NB will assess compliance with RED essential cybersecurity requirements.

4 Issuance of EU-Type Examination Certificate (Module B) (if applicable)

Only after NB approval the manufacturer can issue the EU Declaration of Conformity (DoC) and affix the CE marking.



5

References

Commission Implementing Decision (EU) 2025/138 of 28 January 2025 amending Implementing Decision (EU) 2022/2191 as regards harmonized standards in support of the essential requirements of Directive 2014/53/EU of the European Parliament and of the Council that relate to cybersecurity, for the categories and classes of radio equipment specified in Delegated Regulation (EU) 2022/30.

https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202500138

European Commission's **GUIDANCE ON THE APPLICATION OF THE HARMONIZED STANDARDS SERIES EN 18031:2024 IN SUPPORT OF COMMISSION DELEGATED REGULATION 2022/30.**

<https://circabc.europa.eu/ui/group/43315f45-aaa7-44dc-9405-a86f639003fe/library/70c9aa5b-73a0-4821-8b96-96a7dc46eab1/details>





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