



ACEA

European
Automobile
Manufacturers
Association

EURO 5 PROVISIONS AND VEHICLE SECURITY – ACEA INSIGHTS

General perspective:

- ACEA welcomes the new business opportunity foreseen in the Euro 5 legislation⁽¹⁾ which focuses on Vehicle Manufacturers (VMs) providing reprogramming capability for security-related modules to the Independent Aftermarket (IAM). It provides our customers with greater choice;
- However, VMs are very mindful of the caveat in the Euro 5 legislation that says existing levels of security must not be adversely impacted by this change;
- The Euro 5 legislation establishes a “Forum on Access to Vehicle Information” (“Security Forum”) that will make recommendations on an accreditation system and to ensure there is no reduction in existing levels of vehicle security. This is a good initiative and the VMs are spearheading the work in this Forum;
- Work in the Forum is progressing well but all security stakeholders (VMs, IAM, Insurance, Member States) must participate directly and openly in the Forum, not behind the scenes, in order to make this process work;
- The overriding task of the Forum is to ensure that what is recommended in terms of process is secure and all competing political interests and positions must be set aside in the interest of achieving a robust and secure process. Our customers deserve nothing less;;
- The final process to be adopted must work European-wide and cannot be held hostage to individual interests (e.g. Insurance, IAM etc.) in individual Member States.



Current status and issues:

- A small working group of dedicated representatives from ACEA and AFCAR are tasked with completing the Security Forum report that comprises recommendations, both technical and process-related, aimed at ensuring existing levels of robust vehicle security;
- VMs understand that it is in the interests of all stakeholders to adopt the least onerous process possible for security, provided that it truly delivers robustness. An overly complicated process will contribute to rising costs of implementation for all concerned stakeholders;
- VMs appreciate that from an IAM perspective it is highly desirable that this work progresses rapidly. However, robustness of process cannot be sacrificed on the altar of speed;
- Considerations such as the need for involvement of external agencies, such as the European co-operation for Accreditation (EA) that brings a European-wide dimension to the process, cannot be ignored in the interests of expediency;
- Moreover, during initial discussions in the Security Forum, some stakeholders suggested it would be wise practice to walk before we run and to work initially with a single Trust Centre covering all the EU for identity management and digital certification. VMs believe that this step-by-step approach is sensible and will enhance the general security of the process;
- A paramount concern for VMs is the lack of a clear definition in the legislation of what is meant by “security-related”. Clearly, it encompasses anti-theft modules but the Euro 5 legislation also requires emission-related modules to be tamper-proof and therefore accreditation should be required to secure these modules. Current and future legislation will also require tamper-protection for emission control systems so these should also be covered;
- It is common to find anti-theft modules distributed throughout a vehicle’s system. From an architectural and engineering perspective this is how security and vehicle integrity is best achieved. It is disingenuous to claim that just because an anti-theft component resides in a non-security-related module that this container module should not be secured and subject to accreditation for access. Such claims demonstrate a clear lack of understanding in vehicle security and architecture design. The distribution of modules on a vehicle is the sole preserve of the VM and is governed by a number of interrelated considerations such as vehicle security, safety, cost etc.



What is needed moving forward:

- A clear legal definition of the meaning of the term “security-related”. In ACEA’s opinion, this means, at a minimum, anti-theft modules, emission related modules and information covering any vehicle system that EU legislation mandates to be “tamper-proof” protected;
- Euro 5 legislation clearly states that existing levels of security must not be impaired by this process. Therefore, there needs to be recognition that existing vehicle architecture that provides a robust level of security should not be changed and that VMs must not be forced in to adopting interim ad-hoc measures to provide security-related modules to the IAM in advance of the implementation of the Security Forum recommendations. The Euro 5 legislation must be clear on this point as soon as possible;
- All stakeholders (Insurance, Locksmiths, Member States) participate in the Security Forum to ensure that all opinions and concerns are reflected in the finalized report such that independent Member State-specific requirements are not imposed on VMs subsequent to eventual implementation of the recommendation of the report;
- Questions of how to empower the Security Forum to select the actors in the overall process (i.e. a Trust Centre, CAB etc) must be dealt with. Expediency cannot be the primary concern and ACEA cannot agree that if, by an arbitrary date, such questions are not resolved, we then open the flood gates and let an undefined number of Trust Centres and CABs perform the work. Such a move could fatally impact overall vehicle security and goes against one of the core aims of the legislation;
- Many Member States (in partnership with VMs and other stakeholders) have taken great steps to reduce vehicle theft. These gains must continue and spread across the whole of the EU and beyond;
- The Security Forum process is welcome but the European Commission must co-ordinate its implementation and be responsible within this process through the legislation it introduced⁽¹⁾. The process should be introduced when it is tested and ready and policy makers must give the VMs and all actors in this process a clear, unambiguous and realistic timeframe for planning and implementing these detailed and ambitious requirements. VMs must not be distracted from these aims by the need to provide any interim ad-hoc solution.

⁽¹⁾ Commission Regulation (EC) No 692/2008, Official Journal of the European Union L199, 28.6.2008, p.1. See Article 13(9).

