STATUTORY INSTRUMENTS

2025 No. 1110

ROAD TRAFFIC

The Road Vehicles (Type-Approval) (Amendment) (No. 3) Regulations 2025

Made - - - -	*20th October 2025*
Laid before Parliament	*22nd October 2025*
Coming into force - -	*13th November 2025*

The Secretary of State makes these Regulations in exercise of the powers conferred by Articles 5(3), 31(8), 36(4), 38(3) and 57(2) of Regulation (EU) 2018/858 of the European Parliament and of the Council of 30 May 2018 on the approval and market surveillance of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles, amending Regulations (EC) No 715/2007 and (EC) No 595/2009 and repealing Directive 2007/46/EC ("Regulation (EU) 2018/858")(**a**).

The Secretary of State has consulted with representative organisations in accordance with Article 82(3) of Regulation (EU) 2018/858.

Citation, commencement and extent

1.—(1) These Regulations may be cited as the Road Vehicles (Type-Approval) (Amendment) (No. 3) Regulations 2025.

(2) These Regulations come into force on 13th November 2025.

(3) These Regulations extend to England and Wales, Scotland and Northern Ireland.

Amendment of Regulation (EU) 2018/858

2.—(1) Regulation (EU) 2018/858 is amended as follows.

(2) In Article 57 (UN Regulations required for GB type-approval), after paragraph (2), insert—

"(3) UN Regulations and amendments made thereto which are compulsory and the dates from which they are compulsory are specified in Annex XII.".

(3) In Annex II (requirements for the purpose of GB type-approval of vehicles, systems, components or separate technical units)—

(a) in Part I (regulatory acts for GB type-approval of vehicles produced in unlimited series)—

(i) in the first table, after the row for item 74, insert—

(**a**) EUR 2018/858, amended by S.I. 2019/648, S.I. 2022/1273, S.I. 2024/146, S.I. 2025/661, and S.I. 2025/796.

“75	Cyber security and cyber security management system	UN Regulation No 155	X	X	X	X	X	X					
76	Software update and software update management system	UN Regulation No 156	X	X	X	X	X	X	X	X	X	X”;	

(ii) in Appendix 1 (regulatory acts for GB type-approval of vehicles produced in medium series pursuant to Article 41)—

(aa) in Table 1 (M_1 vehicles), after the row for item 73, insert—

“75	Cyber security and cyber security management system	UN Regulation No 155		X
76	Software update and software update management system	UN Regulation No 156		X”;

(bb) in Table 2 (N_1 Vehicles), after the row for item 73, insert—

“75	Cyber security and cyber security management system	UN Regulation No 155		X
76	Software update and software update management system	UN Regulation No 156		X”;

(b) in Part III (list of regulatory acts setting out the requirements for the purposes of GB type approval of special purpose vehicles)—

(i) in Appendix 1 (motor-caravans, ambulances and hearses), in the table, after the row for item 73, insert—

“75	Cyber security and cyber security management system	UN Regulation No 155	X	X	X	X
76	Software update and software update management system	UN Regulation No 156	X	X	X	X”;

(ii) in Appendix 2 (armoured vehicles), in the table, after the row for item 73, insert—

“75	Cyber security and cyber security management system	UN Regulation No 155	X	X	X	X	X	X					
76	Software update and software update management system	UN Regulation No 156	X	X	X	X	X	X	X	X	X	X”;	

(iii) in Appendix 3 (wheelchair accessible vehicles), in the table, after the row for item 73, insert—

"75	Cyber security and cyber security management system	UN Regulation No 155	X
76	Software update and software update management system	UN Regulation No 156	X";

(iv) in Appendix 4 (other special purpose vehicles), in the table, after the row for item 73, insert—

"75	Cyber security and cyber security management system	UN Regulation No 155	X	X	X	X	X				
76	Software update and software update management system	UN Regulation No 156	X	X	X	X	X	X	X	X	X";

(v) in Appendix 5 (mobile cranes), in the table, after the row for item 73, insert—

"75	Cyber security and cyber security management system	UN Regulation No 155	X N/A in case of complete vehicle
76	Software update and software update management system	UN Regulation No 156	X";

(vi) in Appendix 6 (exceptional load transport vehicles), after the row for item 73, insert—

"75	Cyber security and cyber security management system	UN Regulation No 155	X	
76	Software update and software update management system	UN Regulation No 156	X	X".

(4) In Annex IV (conformity of production procedures), after point 4.6, insert—

"5. Arrangements concerning software update

The software update management system of the manufacturer as well as the whole vehicle type must comply with the requirements of UN Regulation No 156.".

(5) In Annex XII (UN regulations required for GB type-approval)—

(a) in Table 1 (list of UN regulations referred to in Article 57 which apply on a compulsory basis), before the row for Regulation Number 157, insert—

"155	Cyber security and cyber security management system	Original version of UN Regulation No 155	M, N
156	Software update and software update management system	Original version of UN Regulation No 156	M, N, O";

(b) in Table 2 (Scope of application of the requirements referred to in Article 57 - applicable categories per subject)—

(i) before the row for systems replacing the driver's input to controls, insert—

"Cyber security	X	X	X	X	X	X				
Software update	X	X	X	X	X	X	X	X	X	X";

(ii) in the explanatory notes, before note IF, insert—

"X: Vehicles must meet the requirements.";

(c) after the explanatory notes to Table 2, insert—

"Table 3 - Implementation dates for the requirements for cyber security and cyber security management system for vehicles of categories M_1, M_2, M_3, N_1, N_2 and N_3

Vehicle Category	Date of refusal to grant GB type-approval to new types of complete and base vehicles	Date for the prohibition of registration of new complete vehicles and completed vehicles incorporating a noncompliant base vehicle	Date for the prohibition of registration of new completed vehicles	Date for the prohibition of registration of new special purpose vehicles
M_1, M_2, M_3, N_1, N_2, N_3	1 June 2026	1 June 2027	1 June 2028	7 July 2029

Table 4 - Implementation dates for the requirements for software update and software update management system for vehicles of categories M_1, M_2, M_3, N_1, N_2, N_3, O_1, O_2, O_3 and O_4

Vehicle Category	Date of refusal to grant GB type-approval to new types of complete and base vehicles	Date for the prohibition of registration of new complete vehicles and completed vehicles incorporating a noncompliant base vehicle	Date for the prohibition of registration of new completed vehicles	Date for the prohibition of registration of new special purpose vehicles
M_1, M_2, M_3, N_1, N_2, N_3, O_1, O_2, O_3, O_4	1 June 2026	1 June 2027	7 July 2029	7 July 2029";

Amendment of Regulation (EU) 2020/683

3.—(1) Commission Implementing Regulation (EU) 2020/683(**a**) is amended as follows.

(2) In Article 8—

(a) the existing text becomes sub-paragraph "1.";

(b) after that sub-paragraph, insert—

"2. A certificate of conformity which is issued using the template provided for in Annex VIII as it has effect immediately before the coming into force of these Regulations, is to be treated as a GB certificate of conformity issued in accordance with Article 36(1) of Regulation (EU) 2018/858, if—

(a) the vehicle to which it applies was manufactured before 1 June 2027; and

(b) a valid GB type-approval granted in accordance with Regulation (EU) 2018/858 applies to the vehicle.".

(3) In Annex I, in the template for an information document for the GB type-approval of vehicles, systems, components or separate technical units, after point 12.10.3.2, insert——

"12.11. [Intentionally blank]

12.12. [Intentionally blank]

12.13. [Intentionally blank]

12.14. Cyber security

12.14.1. General construction characteristics of the vehicle type, including:

(a) the vehicle systems which are relevant to the cyber security of the vehicle type;

(b) the components of those systems that are relevant to cyber security;

(c) the interactions of those systems with other systems within the vehicle type and external interfaces ...

12.14.2. Schematic representation of the vehicle type: ...

12.14.3. The number of the Certificate of Compliance for cyber security management system: ...

12.14.4. Documents for the vehicle type to be approved describing the outcome of its risk assessment and the identified risks: ...

12.14.5. Documents for the vehicle type to be approved describing the mitigations that have been implemented on the systems listed, or to the vehicle type, and how they address the stated risks: ...

12.14.6. Documents for the vehicle type to be approved describing the protection of dedicated environments for aftermarket software, services, applications or data: ...

12.14.7. Documents for the vehicle type to be approved describing what tests have been used to verify the cyber security of the vehicle type and its systems and the outcome of those tests: ...

12.14.8. Description of the consideration of the supply chain with respect to cyber security: ...

12.15. Software update

12.15.1. General construction characteristics of the vehicle type: ...

12.15.2. The number of the Certificate of Compliance for software update management: ...

(**a**) EUR 2020/683, amended by S.I. 2022/1273 and S.I. 2024/146.

12.15.3. Security measures

12.15.3.1. Documents for the vehicle type to be approved describing that the update process will be performed securely: ...

12.15.3.2. Documents for the vehicle type to be approved describing that the update process will be performed securely: ...

12.15.4. Software updates over the air

12.15.4.1. Documents for the vehicle type to be approved describing that the update process will be performed safely: ...

12.15.4.2. Description of the means of informing vehicle users about an update before and after its execution: ...

12.15.5. Manufacturer's declaration of compliance with the requirements for Software Update Management Systems".

(4) In Annex VIII (certificate of conformity in paper format), in the Appendix (templates for the certificate of conformity in paper format)—

(a) in Part I (complete and completed vehicles)—

(i) in vehicle categories M_1, M_2, M_3, N_1, N_2, and N_3, in each case, after point 52, insert—

"55. Vehicle certified in accordance with UN Regulation No 155: yes/no (4)

56. Vehicle certified in accordance with UN Regulation No 156: yes/no (4)";

(ii) in vehicle categories O_1 and O_2, and O_3 and O_4, in each case, after point 52, insert—

"55. In the case of a vehicle approved to UN Regulation No 155, vehicle certified in accordance with UN Regulation No 155: yes/no (4)

56. In the case of a vehicle approved to UN Regulation No 156, vehicle certified in accordance with UN Regulation No 156: yes/no (4)";

(b) in Part 2 (incomplete vehicles)—

(i) in vehicle categories M_1, M_2, M_3, N_1, N_2, N_3, in each case, after point 52, insert—

"55. Vehicle certified in accordance with UN Regulation No 155: yes/no (4)

56. Vehicle certified in accordance with UN Regulation No 156: yes/no (4)";

(ii) in vehicle categories O_1 and O_2, and O_3 and O_4, in each case, after point 52, insert—

"55. In the case of a vehicle approved to UN Regulation No 155, vehicle certified in accordance with UN Regulation No 155: yes/no (4)

56. In the case of a vehicle approved to UN Regulation No 156, vehicle certified in accordance with UN Regulation No 156: yes/no (4)".

Signed by authority of the Secretary of State for Transport

Simon Lightwood
Parliamentary Under Secretary of State
Department for Transport

20th October 2025

EXPLANATORY NOTE

(This note is not part of the Regulations)

These Regulations amend Regulation (EU) 2018/858 and Commission Implementing Regulation (EU) 2020/683 to make compliance with two UNECE Regulations (UNECE Regulation No 155 on cyber security and cyber security management systems and UNECE Regulation No 156 on software updates and software update management systems) compulsory for vehicles applying for GB type approval.

Regulation 2 updates the list of technical requirements in Annex II of Regulation (EU) 2018/858 that must be met at type approval in the GB scheme to include UNECE Regulations No 155 and No 156, and procedures relating to conformity of production in Annex IV of that Regulation to reference arrangements concerning software updates. It also updates Annex XII of that Regulation to outline the dates on which the requirements apply.

Regulation 3 updates the information document used to make an application for type approval set out in Annex I of Commission Implementing Regulation (EU) 2020/683 to include provision on cyber security and software updates. It also updates Annex VIII of that Regulation to ensure that certificates of conformity contain references to UNECE Regulations No 155 and No 156 where appropriate.

The net costs imposed on business, the voluntary sector and the public sector by these Regulations have been assessed as being less than £10m in any year and therefore a full impact assessment has not been prepared.

The UN Regulations are issued by the United Nations Economic Commission for Europe. Copies of the UN Regulations referred to in these Regulations can be obtained from the UNECE website: http://www.unece.org/trans/main/wp29/wp29regs.html.

An Explanatory Memorandum and a de minimis assessment have been prepared and are available alongside this instrument at www.legislation.gov.uk. Hard copies may be obtained from the Department for Transport, Great Minster House, 33 Horseferry Road, London, SW1P 4DR.

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