



CYBER;
Cyber Security for Consumer Internet of Things:
Baseline Requirements

Document Preview

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Foreword

This draft European Standard (EN) has been produced by ETSI Technical Committee Cyber Security (CYBER), and is now submitted for the combined Public Enquiry and Vote phase of the ETSI EN Approval Procedure.

Proposed national transposition dates	
Date of latest announcement of this EN (doa):	3 months after ETSI publication
Date of latest publication of new National Standard or endorsement of this EN (dop/e):	6 months after doa
Date of withdrawal of any conflicting National Standard (dow):	6 months after doa

Modal verbs terminology

In the present document **"shall"**, **"shall not"**, **"should"**, **"should not"**, **"may"**, **"need not"**, **"will"**, **"will not"**, **"can"** and **"cannot"** are to be interpreted as described in clause 3.2 of the [ETSI Drafting Rules](#) (Verbal forms for the expression of provisions).

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Introduction

As more devices in the home connect to the Internet, the cyber security and data protection of the Internet of Things (IoT) becomes a growing concern. People entrust their personal data to an increasing number of online devices and services. Products and appliances that have traditionally been offline are now connected and need to be designed to withstand cyber threats.

The present document brings together widely considered good practices in security for Internet-connected consumer devices in a set of high-level outcome-focused provisions. The objective of the present document is to support all parties involved in the development and manufacturing of consumer IoT with guidance on securing their products.

The provisions are primarily outcome-focused, rather than prescriptive, giving organizations the flexibility to innovate and implement security and data protection solutions appropriate for their products.

The present document is not intended to solve all security, data protection and privacy challenges associated with consumer IoT. It also does not focus on protecting against attacks that are prolonged/sophisticated or that require sustained physical access to the device. Rather, the focus is on the technical controls and organizational policies that matter most in addressing the most significant and widespread security shortcomings. Overall, a baseline level of security and data protection is considered; this is intended to protect against elementary attacks on fundamental design weaknesses (such as the use of easily guessable passwords).

The present document provides a set of baseline provisions applicable to all consumer IoT devices. It is intended to be complemented by other standards defining more specific provisions and fully testable and/or verifiable requirements for specific devices which, together with the present document, will facilitate the development of assurance schemes.

A clause in the present document in some cases begins with general information about the context of the following provisions. A provision is followed by explanatory text describing, where appropriate, the intent of the provision and how the provision might be implemented. Further information on implementation examples is given in ETSI TR 103 621 [i.31].

Many consumer IoT devices and their associated services process and store personal data, the present document can help in ensuring that these are compliant with the General Data Protection Regulation (GDPR) [i.7]. Security by design is an important principle that is endorsed by the present document.

ETSI TS 103 701 [i.19] provides guidance on how to assess and assure IoT products against provisions within the present document.

The provisions in the present document have been developed following a review of published standards, recommendations and guidance on IoT security and privacy, including: ETSI TR 103 305-3 [i.1], ETSI TR 103 309 [i.2], ENISA Baseline Security Recommendations [i.8], UK Department for Digital, Culture, Media and Sport (DCMS) Secure by Design Report [i.9], IoT Security Foundation Compliance Framework [i.10], GSMA IoT Security Guidelines and Assessment [i.11], ETSI TR 103 533 [i.12], DIN SPEC 27072 [i.20] and OWASP Internet of Things [i.23].

NOTE: Mappings of the landscape of IoT security standards, recommendations and guidance are available in ENISA Baseline Security Recommendations for IoT - Interactive Tool [i.15] and in Copper Horse Mapping Security & Privacy in the Internet of Things [i.14].

As consumer IoT products become increasingly secure, it is envisioned that future revisions of the present document will mandate provisions that are currently recommendations in the present document.

1 Scope

The present document specifies high-level security and data protection provisions for consumer IoT devices that are connected to network infrastructure (such as the Internet or home network) and their interactions with associated services. A non-exhaustive list of examples of consumer IoT devices includes:

- connected children's toys and baby monitors;
- connected smoke detectors, door locks and window sensors;
- IoT gateways, base stations and hubs to which multiple devices connect;
- smart cameras, smart speakers and smart TVs together with their remote controls;
- wearable health trackers;
- connected home automation and alarm systems, especially their gateways and hubs;
- connected appliances, such as washing machines and fridges; and
- smart home assistants.

Moreover, the present document addresses security considerations specific to constraints in device resources.

EXAMPLE: Typical device resources that might constrain the security capabilities are energy supply, communication bandwidth, processing power or (non-)volatile memory capacity.

The present document provides basic guidance through examples and explanatory text for organizations involved in the development and manufacturing of consumer IoT on how to implement those provisions. Table B.1 provides a schema for the reader to give information about the implementation of the provisions.

Devices that are not consumer IoT devices, for example those that are primarily intended to be used in manufacturing, healthcare or other industrial applications, are not in scope of the present document.

The present document has been developed primarily to help protect consumers, however, other users of consumer IoT equally benefit from the implementation of the provisions set out here.

Annex A (informative) of the present document has been included to provide context to clauses 4, 5 and 6 (normative). Annex A contains examples of device and reference architectures and an example model of device states including data storage for each state.

2 References

2.1 Normative references

References are either specific (identified by date of publication and/or edition number or version number) or non-specific. For specific references, only the cited version applies. For non-specific references, the latest version of the referenced document (including any amendments) applies.

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Not applicable.

2.2 Informative references

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NOTE: While any hyperlinks included in this clause were valid at the time of publication, ETSI cannot guarantee their long term validity.

The following referenced documents are not necessary for the application of the present document but they assist the user with regard to a particular subject area.

- [i.1] ETSI TR 103 305-3: "Cyber Security (CYBER); Critical Security Controls for Effective Cyber Defence; Part 3: Internet of Things Sector".
- [i.2] ETSI TR 103 309: "CYBER; Secure by Default - platform security technology".
- [i.3] [NIST Special Publication 800-63B](#): "Digital Identity Guidelines - Authentication and Lifecycle Management".
- [i.4] [ISO/IEC 29147](#): "Information technology - Security techniques - Vulnerability Disclosure".
- [i.5] OASIS: "[CSAF Common Vulnerability Reporting Framework \(CVRF\)](#)".
- [i.6] ETSI TR 103 331: "Cyber Security (CYBER); Structured threat information sharing".
- [i.7] [Regulation \(EU\) 2016/679](#) of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
- [i.8] ENISA: "[Baseline Security Recommendations for IoT in the context of Critical Information Infrastructures](#)", November 2017, ISBN: 978-92-9204-236-3, doi: 10.2824/03228.
- [i.9] UK Department for Digital, Culture, Media and Sport: "[Secure by Design: Improving the cyber security of consumer Internet of Things Report](#)", March 2018.
- [i.10] IoT Security Foundation: "[IoT Security Assurance Framework](#)", Release 3.0, November 2021.
- [i.11] GSMA: "[GSMA IoT Security Guidelines and Assessment](#)".
- [i.12] ETSI TR 103 533: "SmartM2M; Security; Standards Landscape and best practices".
- [i.13] Commission Notice [2016/C 272/01](#): "The "Blue Guide" on the implementation of EU products rules 2016" (Text with EEA relevance).
- [i.14] Copper Horse: "[Mapping Security & Privacy in the Internet of Things](#)".
- [i.15] ENISA: "[Baseline Security Recommendations for IoT - Interactive Tool](#)".
- [i.16] IoT Security Foundation: "[Understanding the Contemporary Use of Vulnerability Disclosure in Consumer Internet of Things Product Companies](#)".
- [i.17] F-Secure: "[IoT threats: Explosion of 'smart' devices filling up homes leads to increasing risks](#)".
- [i.18] W3C®: "[Web of Things at W3C](#)".
- [i.19] ETSI TS 103 701: "CYBER; Cyber Security for Consumer Internet of Things: Conformance Assessment of Baseline Requirements".
- [i.20] DIN SPEC 27072: "Information Technology - IoT capable devices - Minimum requirements for Information security".
- [i.21] GSMA™: "[Coordinated Vulnerability Disclosure \(CVD\) Programme](#)".
- [i.22] IoT Security Foundation: "[Vulnerability Disclosure - Best Practice Guidelines](#)".
- [i.23] [OWASP Internet of Things \(IoT\) Top 10 2018](#).

- [i.24] [IEEE 802.15.4-2015™/Cor 1-2018](#): "IEEE Standard for Low-Rate Wireless Networks, Corrigendum 1".
- [i.25] ETSI TS 102 221: "Smart Cards; UICC-Terminal interface; Physical and logical characteristics".
- [i.26] GSMA™: "SGP.22 Technical Specification v2.2.1".
- [i.27] [ISO/IEC 27005:2022](#): "Information technology - Security techniques - Information security risk management".
- [i.28] Microsoft® Corporation: "[The STRIDE Threat Model](#)".
- [i.29] ETSI TR 121 905: "Digital cellular telecommunications system (Phase 2+) (GSM); Universal Mobile Telecommunications System (UMTS); LTE; 5G; Vocabulary for 3GPP Specifications (3GPP TR 21.905)".
- [i.30] ETSI TR 103 838: "Cyber Security; Guide to Coordinated Vulnerability Disclosure".
- [i.31] ETSI TR 103 621: "Guide to Cyber Security for Consumer Internet of Things".
- [i.32] FIRST: "[Guidelines and Practices for Multi-Party Vulnerability Coordination and Disclosure](#)".
- [i.33] ISO/IEC TR 5895: "Cybersecurity - Multi-party coordinated vulnerability disclosure and handling".
- [i.34] ISO/IEC 16500-6:1999: "Information technology Generic digital audio-visual systems".

3 Definition of terms, symbols and abbreviations

3.1 Terms

For the purposes of the present document, the following terms apply:

administrator: user who has the highest-privilege level possible for a user of the device, which can mean they are able to change any configuration related to the intended functionality.

associated services: digital services that, together with the device, are part of the overall consumer IoT product and that are typically required to provide the product's intended functionality

EXAMPLE 1: Associated services can include mobile applications, cloud computing/storage and third party Application Programming Interfaces (APIs).

EXAMPLE 2: A device transmits telemetry data to a third-party service chosen by the device manufacturer. This service is an associated service.

authentication mechanism: method used to prove the authenticity of an entity

NOTE: An "entity" can be either a user or machine.

EXAMPLE: An authentication mechanism can be the requesting of a password, scanning a QR code, or use of a biometric fingerprint scanner.

authentication value: individual value of an attribute used by an authentication mechanism

EXAMPLE: When the authentication mechanism is to request a password, the authentication value can be a character string. When the authentication mechanism is a biometric fingerprint recognition, the authentication value can be the index fingerprint of the left hand.

best practice: measures that have been shown to provide appropriate security for the corresponding use case

NOTE 1: Appropriate security for the corresponding use case also considers properties of the technology, operating environment and risk.

NOTE 2: Multiple organizations, such as SDOs and public authorities, maintain guides and catalogues of measures that can be used to identify best practice.

EXAMPLE: Applying a security configuration for a specific functionality that takes into account common attacks and is endorsed by multiple organizations such as SDOs and public authorities.

best practice cryptography: cryptography that is suitable for the corresponding use case and has no indications of a feasible attack with current readily available techniques

NOTE 1: This does not refer only to the cryptographic primitives used, but also implementation, key generation and handling of keys.

NOTE 2: Multiple organizations, such as SDOs and public authorities, maintain guides and catalogues of cryptographic methods that can be used.

EXAMPLE: The device manufacturer uses a communication protocol and cryptographic library provided with the IoT platform and where that library and protocol have been assessed against feasible attacks, such as replay.

consumer: natural person who is acting for purposes that are outside her/his trade, business, craft or profession

NOTE: Organizations, including businesses of any size, use consumer IoT. For example, Smart TVs are frequently deployed in meeting rooms, and home security kits can protect the premises of small businesses.

consumer IoT device: network-connected (and network-connectable) device that has relationships to associated services and are used by the consumer typically in the home or as electronic wearables

NOTE 1: Consumer IoT devices are commonly also used in business contexts. These devices remain classified as consumer IoT devices.

NOTE 2: Consumer IoT devices are often available for the consumer to purchase in retail environments. Consumer IoT devices can also be commissioned and/or installed professionally.

critical security parameter: security-related confidential information whose disclosure or modification can compromise the security of the device

EXAMPLE: Secret cryptographic keys, authentication values such as passwords, PINs, private components of certificates.

debug interface: physical interface used by the manufacturer to communicate with the device during development or to perform triage of issues with the device and that is not used as part of the consumer-facing functionality

EXAMPLE: Test points, UART, SWD, JTAG.

defined support period: minimum length of time, expressed as a period or by an end-date, for which a manufacturer will provide security updates

NOTE: This definition focuses on security aspects and not other aspects related to product support such as warranty.

device manufacturer: entity that creates an assembled final consumer IoT product, which is likely to contain the products and components of many other suppliers

factory default: state of the device after factory reset or after final production/assembly

NOTE: This includes the physical device and software (including firmware) that is present on it after assembly.

initialization: process that activates the network connectivity of the device for operation and optionally sets authentication features for a user or for network access

initialized state: state of the device after initialization

IoT product: consumer IoT device and its associated services

isolable: able to be removed from the network it is connected to, where any functionality loss caused is related only to that connectivity and not to its main function; alternatively, able to be placed in a self-contained environment with other devices if and only if the integrity of devices within that environment can be ensured

EXAMPLE: A Smart Fridge has a touchscreen-based interface that is network-connected. This interface can be removed without stopping the fridge from keeping the contents chilled.

logical interface: virtual interface used to communicate with the device at a logical layer

NOTE 1: Typically, the semantic, syntactic, and symbolic attributes of information flows for logical interfaces are specified. There are alternative definitions for logical interfaces e.g. in ISO/IEC 16500-6:1999 [i.34] that utilize this property.

NOTE 2: A logical interface may utilize a network interface to exchange information with remote endpoints.

manufacturer: relevant economic operator in the supply chain (including the device manufacturer)

NOTE: This definition acknowledges the variety of actors involved in the consumer IoT ecosystem and the complex ways by which they can share responsibilities. Beyond the device manufacturer, such entities can also be, for example and depending on a specific case at hand: importers, distributors, integrators, component and platform providers, software providers, IT and telecommunications service providers, managed service providers and providers of associated services.

network interface: physical interface that can be used to access the functionality of consumer IoT via a network

owner: user who owns or who purchased the device

personal data: any information relating to an identified or identifiable natural person

NOTE: This term is used to align with well-known terminology but has no legal meaning within the present document.

physical interface: physical port or air interface (such as radio, audio or optical) used to communicate with the device at the physical layer

EXAMPLE: Radios, ethernet ports, serial interfaces such as USB, and those used for debugging.

public security parameter: security-related public information whose modification can compromise the security of the device

EXAMPLE 1: A public key to verify the authenticity/integrity of software updates.

EXAMPLE 2: Public components of certificates.

remotely accessible: intended to be accessible from outside the local network

security module: set of hardware, software, and/or firmware that implements security functions

EXAMPLE: A device contains a hardware root of trust, a cryptographic software library that operates within a trusted execution environment, and software within the operating system that enforces security such as user separation and the update mechanism. These all make up the security module.

security update: software update that addresses security vulnerabilities either discovered by or reported to the manufacturer

NOTE: Software updates can be purely security updates if the severity of the vulnerability requires a higher priority fix.

sensitive security parameters: critical security parameters and public security parameters

software service: software component of a device that is used to support functionality

EXAMPLE: A runtime for the programming language used within the device software or a daemon that exposes an API used by the device software, e.g. a cryptographic module's API.

telemetry data: data from a device that provide information related to the usage of that device which could help the manufacturer to identify security-related issues

EXAMPLE: A consumer IoT device reports software malfunctions to the manufacturer enabling them to identify and remedy the cause.

NOTE 1: Telemetry data cover usage data, performance data, but also sensor data which facilitate the monitoring of the device's physical and environmental conditions. Therefore, telemetry data do not only help to identify security-related issues, but also help to improve the device's performance and user experience.

NOTE 2: Depending on the content of the telemetry data, telemetry data such as usage data may be considered as personal data.

unique per device: unique for each individual device of a given product class or type

user: natural person or organization

user interface: user facing interface of the consumer IoT device

EXAMPLE: Buttons, screens, speaker, audio/video recorder as part of the consumer IoT device or user facing logical interfaces such as frontends of services provided by the consumer IoT device.

vulnerability management process: course of action in which an organization addresses and remediates a disclosed vulnerability

3.2 Symbols

Void.

3.3 Abbreviations

For the purposes of the present document, the following abbreviations apply:

API	Application Programming Interface
ASLR	Address Space Layout Randomization
CVD	Coordinated Vulnerability Disclosure
CVRF	Common Vulnerability Reporting Framework
DDoS	Distributed Denial of Service
DSC	Dedicated Security Components
ENISA	European Union Agency for Network and Information Security
EU	European Union
GDPR	General Data Protection Regulation
GSM	Global System for Mobile communications
GSMA	GSM Association
IEEE	Institute of Electrical and Electronics Engineers
IoT	Internet of Things
IP	Internet Protocol
ISO	International Organization for Standardization
JTAG	Joint Test Action Group
LAN	Local Area Network
LoRaWAN	Long Range Wide Area Network
MAC	Media Access Control
MPCVD	Multi-Party Coordinated Vulnerability Disclosure
NIST	National Institute of Standards and Technology
NX	No eXecute
OTP	One-Time Password
OWASP	Open Web Application Security Project
QR	Quick Response
SBOM	Software Bill of Materials
SDO	Standards Development Organization
SE	Secure Elements
SSID	Service Set IDentifier

STRIDE	Spoofing, Tampering, Repudiation, Information disclosure, Denial of service, Elevation of privilege
SWD	Serial Wire Debug
TEE	Trusted Execution Environment
TS	Technical Specification
UART	Universal Asynchronous Receiver-Transmitter
UI	User Interface
UK	United Kingdom
USB	Universal Serial Bus
WAN	Wide Area Network

4 Implementation of the standard

The implementation of provisions in the present document is informed by risk assessment and threat modelling (such as ISO/IEC 27005:2022 [i.27] and STRIDE Threat Model [i.28]) and data protection and privacy impact assessments; that are performed by the device manufacturer and/or other relevant entities and are out of scope of the present document. For certain use cases and following risk assessment, it can be appropriate to apply additional provisions as well as those contained within the present document. In all cases, security, data protection and privacy by design and by default should be used to inform the product development process, following risk assessment, but that is out of scope of the present document.

The present document sets a security and data protection baseline; however, due to the broad landscape of consumer IoT it is recognized that the applicability of provisions is dependent on each device. The present document provides a degree of flexibility through the use of non-mandatory "should" provisions (recommendations).

The present document defines the security requirements for the device, it does not define a testing or certification method to assess the requirements against. Some methods of fulfilling the requirements in the present document can impact testing and certification making it very difficult, or even impossible, to demonstrate compliance in certain test regimes.

Testing and certification involving third party assessment is likely to require documentation, including architectural design documentation, security requirements capture and analysis, threat models and environmental assumptions, policy documentation for lifecycle management (including supply chain management), assessment certificates for any components that are used to implement functionality required in the present document. These documentation requirements will be defined by the testing regime and are out of scope of the present document. A way to assess conformance to the present document is specified in ETSI TS 103 701 [i.19].

5 Cyber security provisions for consumer IoT

5.0 Reporting implementation

Provision 5.0-1 A justification shall be recorded for each recommendation in the present document that is considered to be not applicable for or not fulfilled by the consumer IoT device.

It is recommended that the manufacturer conducts a threat modelling to identify, analyse and mitigate threats to the device.

Table B.1 provides a schema to record these justifications in a structured manner. This is to allow other stakeholders (e.g. assurance assessors, members of the supply chain, security researchers or retailers) to determine whether provisions have been applied correctly and appropriately.

EXAMPLE 1: The manufacturer publishes a completed version of table B.1 alongside the product description on their website.

EXAMPLE 2: The manufacturer completes table B.1 for internal record keeping. Sometime later, an external assurance organization assesses a product against the present document and requests information relating to the product's security design. The manufacturer can easily provide this information as it is contained within table B.1.