The European Association of the Electricity Transmission and Distribution Equipment and Services Industry

Timely Citation of EN IEC 62443 as Harmonised Standards in Support of the Cyber Resilience Act

T&D Europe Position in Support of the Orgalim Joint Industry Statement

Introduction

T&D Europe, the Association of the European Electricity Transmission and Distribution Equipment and Services Industry, writes to express its strong and unequivocal support for the Joint Industry Statement issued by Orgalim, calling on the European Commission to ensure the timely citation of the proposed EN IEC 62443 as harmonised standards in the Official Journal of the European Union (OJEU) in the context of the Cyber Resilience Act (CRA, [EU] 2024/ 2847).

T&D Europe represents manufacturers and service providers of electrical equipment and systems that are fundamental to Europe's electricity infrastructure — encompassing transmission networks, distribution grids, substations, smart energy management systems, and operational technology (OT) assets. Our members operate at the very intersection of energy and digital transformation, and as such, the timely and effective implementation of the CRA, underpinned by internationally recognised cybersecurity standards, is of paramount importance to our industry.

1. Why IEC 62443 Is Indispensable for the Energy Sector

The international benchmark for industrial cybersecurity. The IEC 62443 series is the leading international framework for securing industrial automation and control systems (IACS). In the energy sector, it is more than a technical reference: manufacturers use it to demonstrate the cybersecurity and conformity of smart meters, grid control systems, substation automation, distributed energy resource management systems (DERMS), and other OT-connected devices.

A shared framework across the energy ecosystem. IEC 62443 gives technology providers, service providers, system integrators, and grid operators a common language for defining cybersecurity objectives, required cybersecurity technical capabilities, and target cybersecurity levels.

A mature European ecosystem. The framework is already widely implemented across Europe, following a decade of sustained investment by industry stakeholders. An established network of

accredited third-party certification bodies supports its application, reinforces the international credibility of Europe's energy industry, and strengthens its competitiveness in export markets.

Risks of delayed citation. Without timely citation of the proposed EN IEC 62443-4-1 and EN IEC 62443-4-2 in the OJEU, energy-sector manufacturers will face prolonged regulatory uncertainty. This delay could disrupt investment decisions and operational continuity, while eroding the value of cybersecurity measures already deployed and proven across EU Member States and international markets.

2. T&D Europe's Support for Orgalim's Call to Action

T&D Europe fully endorses the key arguments advanced by Orgalim in its Joint Industry Statement. From the energy sector's perspective, we consider the following points especially urgent:

- **Legal certainty for manufacturers:** CRA obligations will soon apply. Energy sector manufacturers that have long invested in cybersecurity processes and secure products need immediate clarity to validate their conformity assessment procedures. Delayed citation directly delays compliance and increases legal exposure.
- **European competitiveness anchored in global standards:** IEC 62443 is a globally adopted standard and primary reference in the sector. Deviation from it — or failure to cite it in the OJEU in a timely manner — creates fragmentation that disadvantages European manufacturers in international markets while conferring no additional cybersecurity benefit.
- **Supporting the EU's simplification agenda:** The Commission has repeatedly emphasised cutting regulatory complexity. Timely citation of existing, proven EU standards such as EN IEC 62443 is entirely consistent with this objective and avoids forcing manufacturers to use alternative, less suitable compliance pathways.

3. Our Request to the European Commission

T&D Europe respectfully urges the European Commission, and specifically DG CONNECT, to take the following concrete steps without further delay:

- Prioritise and accelerate the process for citing the proposed EN IEC 62443-4-1 and EN IEC 62443-4-2 in the OJEU as harmonised standards under the CRA, providing the legal status that manufacturers and market surveillance authorities require.
- Engage in transparent dialogue with industry, including the energy technology sector, on the implementation timeline and any outstanding technical or administrative obstacles to citation.

We welcome the opportunity to meet with DG CONNECT representatives to discuss these matters further and to share the concrete experience of our member companies operating at the

forefront of Europe's grid digitalisation. T&D Europe stands ready to contribute constructively to a rapid and effective resolution.

Brussels, 20 November 2026