

AQUA's Position on the Implementation of the Radio Equipment Directive Delegated Regulation (EU) 2022/30 under Implementing Decision C(2022) 5637 related to Cybersecurity

[Reference: Official Regulation Document](#)

This document outlines the position of AQUA, the European Association of Water and Thermal Energy Meter Manufacturers, on the Radio Equipment Directive (RED) Delegated Regulation (EU) 2022/30.

Purpose and Scope

This position paper serves as a guideline for implementing the RED Delegated Regulation (EU) 2022/30 in the context of smart metering. It is not legally binding, and compliance with this guideline does not guarantee conformity with the RED. It does not exempt manufacturers from conducting their own risk assessments.

Cybersecurity Implications of the Delegated Act

AQUA supports the implementation of the RED Delegated Regulation (EU) 2022/30, which aims to enhance the cybersecurity of radio equipment by incorporating provisions for data protection and privacy. This initiative addresses the increasing risks posed by the growing network of connected devices in the Internet of Things (IoT) ecosystem. The EU emphasizes three primary objectives of this regulation:

- **Improved Network Resilience:** Mitigating vulnerabilities in wireless devices
 - **Enhanced Consumer Privacy:** Strengthening data protection regulations
 - **Reduced Risk of Fraud:** Preventing financial exploitation through secure communication systems
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Importance of Smart Metering

Smart meters measure and transmit thermal energy, gas, water, or electricity consumption data via wireless communication systems to billing or building management platforms. This technology enables efficient resource management, enhances consumer awareness, and supports the optimization and digitalization of energy and water distribution. Smart metering systems are essential for:

- Driving innovation and digitalization in the energy sector
- Achieving cost-efficient and energy-saving objectives

- Supporting a demand-driven, flexible, and environmentally friendly energy system
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Overview of the Radio Equipment Directive (RED)

The essential requirements for achieving conformity with the RED Delegated Regulation (EU) 2022/30 are defined in the harmonized standards EN 18031-1, -2, and -3, applicable to radio equipment placed on the EU market. The Directive also establishes governance structures for regulating wireless devices.

Article 1 of Delegated Regulation (EU) 2022/30 defines "internet-connected radio equipment" as "any radio equipment that can communicate itself over the internet, whether it communicates directly or via any other equipment."

Establishing a common understanding of this term is crucial for European Standardization Organizations (ESOs), economic operators, and market surveillance authorities.

AQUA's Recommendation

AQUA strongly endorses the Orgalim framework for defining "**internet-connected devices**" and specifically supports the interpretation of internet-connected radio equipment found on page 3 of the referenced Orgalim paper. AQUA also recommends adopting **Scenario 4** and **Scenario 5**, which are particularly relevant for smart meters operating under EN 13757, ensuring alignment with industry best practices and regulatory expectations. Furthermore, AQUA strongly endorses the report created by a group of smart meter stakeholders, including members from ESMIG, AQUA, OMS and the Ad-Hoc subgroup on Smart Meters from the CEN/CENELEC/ETSI Coordination Group on Smart Grids.

While such an agreement would not be legally binding, it could be included in the **Guidelines to the 2014/53/EU Radio Equipment Directive (RED)** as a widely accepted industry standard, thereby reinforcing the legal framework. The European Commission has encouraged industry stakeholders to submit case studies that further clarify this definition. A relevant discussion paper, available [here](#), outlines industry perspectives and use cases. Furthermore, the report created by the smart meter stakeholders, available [here](#), provides a commentary on whether and how each of the requirements and the standards themselves might apply to smart meters.

Outlook

The RED Delegated Regulation will be complemented by the forthcoming **European Cyber Resilience Act**, which will introduce horizontal rules for connected devices. Together, these regulations will form the foundation of a robust European single market for smart and IoT-enabled products.

About AQUA

AQUA primarily represents family-owned small and medium-sized enterprises that provide products and solutions for critical infrastructure and energy efficiency across Europe.

About Orgalim

Orgalim is Europe's leading technology industry association. As of 2025, it comprises 770,000 companies, generating a total turnover of €2.835 trillion, accounting for one-third of European exports, and providing 11.7 million direct jobs.

About CEN/CENELEC/ETSI

CEN/CENELEC/ETSI are the three European Standardization Organizations (ESOs) that create standards for Europe. CEN develops standards for general sectors, CENELEC focuses on electrotechnical standards, and ETSI specializes in information and communication technologies.

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By presenting this position, AQUA aims to contribute to the development of a robust regulatory environment that supports innovation, cybersecurity, and market harmonization within the EU.