

Form C: Type Test Verification Report

All Micro-generators connected to the **DNO Distribution Network** shall be **Fully Type Tested**. This form is the **Manufacturer's** declaration of compliance with the requirements of EREC G98.

This form should be used when making a Type Test submission to the Energy Networks Association (ENA) Type Test Register.

If the **Micro-generator** is **Fully Type Tested** and already registered with the ENA Type Test Register, the **Installation Document** should include the **Manufacturer's** Reference Number (the system reference), and this form does not need to be submitted.

Manufacturer's reference number		2022_07_0008	
Micro-generator technology		R5-3.6K-S2-15 Grid-connected PV Inverter, Non-isolated Input: 80V-600Vdc, 15/15A Output: 230Vac, 16A, 3680W	
Manufacturer name		Guangzhou Sanjing Electric Co., Ltd.	
Address		No.9, Lizhishan Road, Science City, Guangzhou High-tech Zone, Guangdong, P.R.China	
Tel	+86 020-6660 8528	Fax	020-6660 8617
E-mail	guangquan.pan@saj-electric.com	Web site	http://www.saj-electric.cn
Registered Capacity , use separate sheet if more than one connection option.	Connection Option		
	3.68	kW single phase, single, split or three phase system	
		kW three phase	
		kW two phases in three phase system	
	kW two phases split phase system		
Energy storage capacity for Electricity Storage devices		kWh	
Manufacturer Type Test declaration. - I certify that all products supplied by the company with the above Fully Type Tested reference number will be manufactured and tested to ensure that they perform as stated in this document, prior to shipment to site and that no site modifications are required to ensure that the product meets all the requirements of EREC G98.			
Signed	 2022-7-28	On behalf of	Guangzhou Sanjing Electric Co., Ltd.

Note that testing can be done by the **Manufacturer** of an individual component or by an external test house.

Where parts of the testing are carried out by persons or organisations other than the **Manufacturer** then that person or organisation shall keep copies of all test records and results supplied to them to verify that the testing has been carried out by people with sufficient technical competency to carry out the tests.

Operating Range: This test should be carried out as specified in A.1.2.10.

Pass or failure of the test should be indicated in the fields below (right hand side), for example with the statement "Pass", "No disconnection occurs", etc. Graphical evidence is preferred.

<p>Test 1</p> <p>Voltage = 85% of nominal (195.5 V)</p> <p>Frequency = 47.0 Hz</p> <p>Power factor = 1</p> <p>Period of test 20 seconds</p>	<p>Test results: Passed</p>
<p>Test 2</p> <p>Voltage = 85% of nominal (195.5 V)</p> <p>Frequency = 47.5 Hz</p> <p>Power factor = 1</p> <p>Period of test 90 minutes</p>	<p>Test results: Passed</p>
<p>Test 3</p> <p>Voltage = 110% of nominal (253 V).</p> <p>Frequency = 51.5 Hz</p> <p>Power factor = 1</p> <p>Period of test 90 minutes</p>	<p>Test results: Passed</p>
<p>Test 4</p> <p>Voltage = 110% of nominal (253 V).</p> <p>Frequency = 52.0 Hz</p> <p>Power factor = 1</p> <p>Period of test 15 minutes</p>	<p>Test results: Passed</p>

<p>Test 5</p> <p>Voltage = 100% of nominal (230 V).</p> <p>Frequency = 50.0 Hz</p> <p>Power factor = 1</p> <p>Period of test 90 minutes</p>	<p>Test results: Passed</p>
<p>Test 6 RoCoF withstand</p> <p>Confirm that the Micro-Generating Plant is capable of staying connected to the Distribution Network and operate at rates of change of frequency up to 1 Hzs⁻¹ as measured over a period of 500 ms.</p>	<p>Test results: Passed</p>

Power Quality – Harmonics: These tests should be carried out as specified in BS EN 61000-3-2. The chosen test should be undertaken with a fixed source of energy at two power levels a) between 45 and 55% and b) at 100% of **Registered Capacity**. The test requirements are specified in Annex A1 A.1.3.1 (**Inverter** connected) or Annex A2 A.2.3.1 (Synchronous).

Micro-generator tested to BS EN 61000-3-2

<p>Micro-generator rating per phase (rpp)</p>	<p>3.68</p>	<p>kW</p>				
<p>For 3-phase Micro-generators, tick this box if harmonic measurements are identical for all three phases. If the harmonics are not identical for each phase, please replicate this section with the results for each phase.</p>						
<p>Harmo nic</p>	<p>At 45-55% of Registered Capacity¹</p>		<p>100% of Registered Capacity</p>			
	<p>Measured Value MV in Amps</p>		<p>Measured Value MV in Amps</p>		<p>Limit in BS EN 61000 -3-2 in Amps</p>	<p>Higher limit for odd harmonics 21 and above</p>

¹ See the note in A.2.3.1 if 45-55% of **Registered Capacity** is below the minimum stable operating level. If an alternative loading level is chosen, the level should be indicated on the test form and the reason for not testing at 45-55% of **Registered Capacity** should be stated. The additional comments box at the end of the harmonics test sheet can be used for this.

2	0.006	--	0.012	--	1.080	
3	0.012	--	0.004	--	2.300	
4	0.005	--	0.009	--	0.430	
5	0.068	--	0.057	--	1.140	
6	0.003	--	0.003	--	0.300	
7	0.048	--	0.055	--	0.770	
8	0.003	--	0.004	--	0.230	
9	0.005	--	0.008	--	0.400	
10	0.003	--	0.003	--	0.184	
11	0.018	--	0.033	--	0.330	
12	0.001	--	0.002	--	0.153	
13	0.022	--	0.017	--	0.210	
14	0.002	--	0.005	--	0.131	
15	0.004	--	0.004	--	0.150	
16	0.002	--	0.007	--	0.115	
17	0.020	--	0.003	--	0.132	
18	0.002	--	0.004	--	0.102	
19	0.022	--	0.006	--	0.118	
20	0.002	--	0.004	--	0.092	
21	0.002	--	0.002	--	0.107	0.160
22	0.003	--	0.005	--	0.084	
23	0.013	--	0.017	--	0.098	0.147
24	0.001	--	0.004	--	0.077	
25	0.005	--	0.022	--	0.090	0.135
26	0.001	--	0.002	--	0.071	
27	0.003	--	0.008	--	0.083	0.124
28	0.001	--	0.006	--	0.066	
29	0.008	--	0.021	--	0.078	0.117

30	0.001	--	0.008	--	0.061	
31	0.010	--	0.032	--	0.073	0.109
32	0.002	--	0.005	--	0.058	
33	0.007	--	0.002	--	0.068	0.102
34	0.003	--	0.001	--	0.054	
35	0.012	--	0.030	--	0.064	0.096
36	0.001	--	0.006	--	0.051	
37	0.014	--	0.018	--	0.061	0.091
38	0.003	--	0.001	--	0.048	
39	0.002	--	0.004	--	0.058	0.087
40	0.003	--	0.004	--	0.046	

Note the higher limits for odd harmonics 21 and above are only allowable under certain conditions, if these higher limits are utilised please state the exemption used as detailed in part 6.2.3.4 of BS EN 61000-3-2 in the box below.

Additional comments:

Power Quality – Voltage fluctuations and Flicker: These tests should be undertaken in accordance with EREC G98 Annex A1 A.1.3.3 (**Inverter** connected) or Annex A2 A.2.3.3 (Synchronous).

The standard test impedance is 0.4 Ω for a single phase **Micro-generating Plant** (and for a two phase unit in a three phase system) and 0.24 Ω for a three phase **Micro-generating Plant** (and for a two phase unit in a split phase system). Please ensure that both test and standard impedance are completed on this form. If the test impedance (or the measured impedance) is different to the standard impedance, it must be normalised to the standard impedance as follows (where the **Power Factor** of the generation output is 0.98 or above):

d_{max} normalised value = (Standard impedance / Measured impedance) x Measured value.

Where the Power Factor of the output is under 0.98 then the X to R ratio of the test impedance should be close to that of the standard impedance.

The stopping test should be a trip from full load operation.

The duration of these tests needs to comply with the particular requirements set out in the testing notes for the technology under test.

The test date and location must be declared.

Test start date	2022-4-9			Test end date	2022-4-9			
Test location	Guangzhou Sanjing Electric Co., Ltd.							
	Starting			Stopping			Running	
	d(max)	d(c)	d(t)	d(max)	d(c)	d(t)	P _{st}	P _{It} 2 hours
Measured Values at test impedance	0.236	0.208	0	0.244	0.224	0	0.168	0.152
Normalised to standard impedance	0.236	0.208	0	0.244	0.224	0	0.168	0.152
Normalised to required maximum impedance	--	--	--	--	--	--	--	--
Limits set under BS EN 61000-3-11	4%	3.3%	3.3%	4%	3.3%	3.3%	1.0	0.65
Test Impedance	R	0.4	Ω	X	0.25	Ω		
Standard Impedance	R	0.24 * 0.4 ^	Ω	X	0.15 * 0.25 ^	Ω		
Maximum Impedance	R	--	Ω	X	--	Ω		

*Applies to three phase and split single phase **Micro-generators**. Delete as appropriate.

^ Applies to single phase **Micro-generators** and **Micro-generators** using two phases on a three phase system. Delete as appropriate.

Power quality – DC injection: This test should be carried out in accordance with A 1.3.4 as applicable.

The % DC injection (“as % of rated AC current” below) is calculated as follows:

$$\% \text{ DC injection} = \text{Recorded DC value in Amps} / \text{base current}$$

where the base current is the **Registered Capacity** (W) / 230 V. The % DC injection should not be greater than 0.25%.

Test power level	20%	50%	75%	100%
Recorded DC value in Amps	0.033	0.035	0.032	0.036
as % of rated AC current	0.21	0.22	0.20	0.23
Limit	0.25%	0.25%	0.25%	0.25%

Power Quality – Power factor: This test shall be carried out in accordance with A.1.3.2 and A.2.3.2 at three voltage levels and at **Registered Capacity** and the measured **Power Factor** must be greater than 0.95 to pass. Voltage to be maintained within $\pm 1.5\%$ of the stated level during the test.

	216.2 V	230 V	253 V
Measured value	0.988	0.998	0.998
Power Factor Limit	>0.95	>0.95	>0.95

Protection – Frequency tests: These tests should be carried out in accordance with Annex A1 A.1.2.3 (**Inverter** connected) or Annex A2 A.2.2.3 (Synchronous). For trip tests, frequency and time delay should be stated. For “no trip tests”, “no trip” can be stated.

Function	Setting		Trip test		“No trip tests”	
	Frequency	Time delay	Frequency	Time delay	Frequency /time	Confirm no trip
U/F stage 1	47.5 Hz	20 s	47.51 Hz	20.20 s	47.7 Hz 30 s	No trip
U/F stage 2	47 Hz	0.5 s	46.99 Hz	0.510 s	47.2 Hz 19.5 s	No trip
					46.8 Hz 0.45 s	No trip
O/F stage 1	52 Hz	0.5 s	52.01 Hz	0.502 s	51.8 Hz 120.0 s	No trip
					52.2 Hz 0.45 s	No trip

Note. For frequency trip tests the frequency required to trip is the setting ± 0.1 Hz. In order to measure the time delay a larger deviation than the minimum required to operate the projection can be used. The “No trip tests” need to be carried out at the setting ± 0.2 Hz and for the relevant times as shown in the table above to ensure that the protection will not trip in error.

Protection – Voltage tests: These tests should be carried out in accordance with Annex A1 A.1.2.2 (**Inverter** connected) or Annex A2 A.2.2.2 (Synchronous). For trip tests, voltage and time delay should be stated. For “no trip tests”, “no trip” can be stated.

Function	Setting		Trip test		“No trip tests”	
	Voltage	Time delay	Voltage	Time delay	Voltage /time	Confirm no trip
U/V	184 V	2.5 s	183.6 V	2.508 s	188 V 5.0 s	No trip
					180 V 2.45 s	No trip
O/V stage 1	262.2 V	1.0 s	261.5 V	1.02 s	258.2 V 5.0 s	No trip
O/V stage 2	273.7 V	0.5 s	272.6 V	0.520 s	269.7 V 0.95 s	No trip
					277.7 V 0.45 s	No trip

Note for Voltage tests the Voltage required to trip is the setting ± 3.45 V. The time delay can be measured at a larger deviation than the minimum required to operate the protection. The No trip tests need to be carried out at the setting ± 4 V and for the relevant times as shown in the table above to ensure that the protection will not trip in error.

Protection – Loss of Mains test: For PV **Inverters** shall be tested in accordance with BS EN 62116. Other **Micro-generators** should be tested in accordance with A.2.2.4 at 10%, 55% and 100% of rated power.

To be carried out at three output power levels with a tolerance of plus or minus 5% in Test Power levels.²

Test Power	10%	55%	100%	10%	55%	100%
Balancing load on islanded network	95% of Registered Capacity	95% of Registered Capacity	95% of Registered Capacity	105% of Registered Capacity	105% of Registered Capacity	105% of Registered Capacity
Trip time. Limit is 0.5 s	--	--	--	--	--	--

For Multi phase **Micro-generators** confirm that the device shuts down correctly after the removal of a single fuse as well as operation of all phases.

Test Power	10%	55%	100%	10%	55%	100%
Balancing load on islanded network	95% of Registered Capacity	95% of Registered Capacity	95% of Registered Capacity	105% of Registered Capacity	105% of Registered Capacity	105% of Registered Capacity

² See the note in A.2.2.4 if the suggested loading levels are below the minimum stable operating level. If alternative loading levels are chosen, the level should be indicated on the test form and the reason for not testing at 10%/55% of **Registered Capacity** should be stated. The additional comments box at the end of the loss of mains test sheet can be used for this.

Test Power	10%	55%	100%	10%	55%	100%
Balancing load on islanded network	95% of Registered Capacity	95% of Registered Capacity	95% of Registered Capacity	105% of Registered Capacity	105% of Registered Capacity	105% of Registered Capacity
Trip time. Ph2 fuse removed	--	--	--	--	--	--
Test Power	10%	55%	100%	10%	55%	100%
Balancing load on islanded network	95% of Registered Capacity	95% of Registered Capacity	95% of Registered Capacity	105% of Registered Capacity	105% of Registered Capacity	105% of Registered Capacity
Trip time. Ph3 fuse removed	--	--	--	--	--	--
Note for technologies which have a substantial shut down time this can be added to the 0.5 s in establishing that the trip occurred in less than 0.5 s. Maximum shut down time could therefore be up to 1.0 s for these technologies.						
Indicate additional shut down time included in above results.					--ms	
Additional comments:						
For Inverters tested to BS EN 62116 the following sub set of tests should be recorded in the following table.						
Test Power and imbalance	33% -5% Q Test 22	66% -5% Q Test 12	100% -5% P Test 5	33% +5% Q Test 31	66% +5% Q Test 21	100% +5% P Test 10
Trip time. Limit is 0.5 s ³	0.184s	0.210s	0.222s	0.204s	0.218s	0.230s
Protection – Frequency change, Vector Shift Stability test: This test should be carried out in accordance with EREC G98 Annex A1 A.1.2.6 (Inverter connected) or Annex A2 A.2.2.6 (Synchronous). Confirmation is required that the Micro-generating Plant does not trip under positive / negative vector shift.						
	Start Frequency	Change	Confirm no trip			
Positive Vector Shift	49.0 Hz	+50 degrees	No trip			
Negative Vector Shift	50.0 Hz	- 50 degrees	No trip			
Protection – Frequency change, RoCoF Stability test: The requirement is specified in section 11.3, test procedure in Annex A.1.2.6 (Inverter connected) or Annex A2 A.2.2.6 (Synchronous). Confirmation is required that the Micro-generating Plant does not trip for the duration of the ramp up and ramp down test.						
Ramp range	Test frequency ramp:	Test Duration	Confirm no trip			
49.0 Hz to 51.0 Hz	+0.95 Hzs ⁻¹	2.1 s	No trip			
51.0 Hz to 49.0 Hz	-0.95 Hzs ⁻¹	2.1 s	No trip			

³If the device requires additional shut down time (beyond 0.5 s but less than 1 s) then this should be stated on this form.

Limited Frequency Sensitive Mode – Overfrequency test: This test should be carried out in accordance with A.1.2.8. The test should be carried out using the specific threshold frequency of 50.4 Hz and Droop of 10%. The measurement tolerances are contained in A.1.2.8. Pref=Registered Capacity				
Test sequence at Registered Capacity >80%	Measured Active Power Output (W)	Frequency (Hz)	Primary Power Source (W)	Active Power Gradient
Step a) 50.00 Hz ±0.01 Hz	3674.1	50.00	3751.6	--
Step b) 50.45 Hz ±0.05 Hz	3637.7	50.45		20%Pref/Hz
Step c) 50.70 Hz ±0.10 Hz	3451.2	50.70		20%Pref/Hz
Step d) 51.15 Hz ±0.05 Hz	3123.0	51.15		20%Pref/Hz
Step e) 50.70 Hz ±0.10 Hz	3454.0	50.70		20%Pref/Hz
Step f) 50.45 Hz ±0.05 Hz	3638.1	50.45		20%Pref/Hz
Step g) 50.00 Hz ±0.01 Hz	3674.5	50.00		--
Test sequence at Registered Capacity 40% - 60%	Measured Active Power Output (W)	Frequency (Hz)	Primary Power Source (W)	Active Power Gradient
Step a) 50.00 Hz ±0.01 Hz	1838.5	50.00	1878.8	--
Step b) 50.45 Hz ±0.05 Hz	1802.7	50.45		20%Pref/Hz
Step c) 50.70 Hz ±0.10 Hz	1618.6	50.70		20%Pref/Hz
Step d) 51.15 Hz ±0.05 Hz	1287.0	51.15		20%Pref/Hz
Step e) 50.70 Hz ±0.10 Hz	1618.9	50.70		20%Pref/Hz
Step f) 50.45 Hz ±0.05 Hz	1802.5	50.45		20%Pref/Hz
Step g) 50.00 Hz ±0.01 Hz	1838.2	50.00		--
Power output with falling frequency test: This test should be carried out in accordance with A.1.2.7.				
Test sequence	Measured Active Power Output (W)	Frequency (Hz)	Primary power source	
Test a) 50 Hz ± 0.01 Hz	3683 W	50.00 Hz	3758.2 W	
Test b) Point between 49.5 Hz and 49.6 Hz	3678 W	49.50 Hz	3748.4 W	
Test c) Point between 47.5 Hz and 47.6 Hz	3675 W	47.55 Hz	3747.4 W	
NOTE: The operating point in Test (b) and (c) shall be maintained for at least 5 minutes				

Re-connection timer.					
Test should prove that the reconnection sequence starts after a minimum delay of 20 s for restoration of voltage and frequency to within the stage 1 settings of Table 2. Both the time delay setting and the measured delay should be provided in this form; both should be greater than 20 s to pass. Confirmation should be provided that the Micro-generating Plant does not reconnect at the voltage and frequency settings below; a statement of “no reconnection” can be made.					
Time delay setting	Measured delay	Checks on no reconnection when voltage or frequency is brought to just outside stage 1 limits of table 2.			
60 s	64 s	At 266.2 V	At 180.0 V	At 47.4 Hz	At 52.1 Hz
Confirmation that the Micro-generator does not re-connect.		No reconnection	No reconnection	No reconnection	No reconnection
Fault level contribution: These tests shall be carried out in accordance with EREC G98 Annex A1 A.1.3.5 (Inverter connected) and Annex A2 A.2.3.4 (Synchronous). Please complete each entry, even if the fault contribution is zero.					
For machines with electro-magnetic output			For Inverter output		
Parameter	Symbol	Value	Time after fault	Volts	Amps
Peak Short Circuit current	i_p	--	20 ms	28.5 V	0.71 A
Initial Value of aperiodic current	A	--	100 ms	25.2 V	0.38 A
Initial symmetrical short-circuit current*	I_k	--	250 ms	0.80 V	0.26 A
Decaying (aperiodic) component of short circuit current*	i_{DC}	--	500 ms	0.50 V	0.22 A
Reactance/Resistance Ratio of source*	X/R	--	Time to trip	0.05	In seconds
For rotating machines and linear piston machines the test should produce a 0 s – 2 s plot of the short circuit current as seen at the Micro-generator terminals.					
* Values for these parameters should be provided where the short circuit duration is sufficiently long to enable interpolation of the plot					
Logic Interface (input port)					
Confirm that an input port is provided and can be used to reduce the Active Power output to zero					Yes
Provide high level description of logic interface, e.g. details in 9.4.3 such as AC or DC signal (the additional comments box below can be used)					Yes
Self-Monitoring solid state switching: No specified test requirements. Refer to EREC G98 Annex A1 A.1.3.6 (Inverter connected).					N/A

It has been verified that in the event of the solid state switching device failing to disconnect the Micro-generator , the voltage on the output side of the switching device is reduced to a value below 50 V within 0.5 s.	N/A
Cyber security	
Confirm that the Manufacturer or Installer of the Micro-generator has provided a statement describing how the Micro-generator has been designed to comply with cyber security requirements, as detailed in 9.7.	Yes
Additional comments	
<p>Logic Interface (input port):</p> <p>The DNO logic interface will take the form of a simple binary output that can be operated by the switch. When the switch is turned off the Power Generating Module can operate normally. When the switch is turned on the Power Generating Module will reduce its Active Power to zero within 5 s. The signal from the Power Generating Module that is being switched is DC (maximum value 3.3Vdc).</p> <p>Cyber security:</p> <p>See attached statement.</p>	



DECLARATION OF CONFORMITY

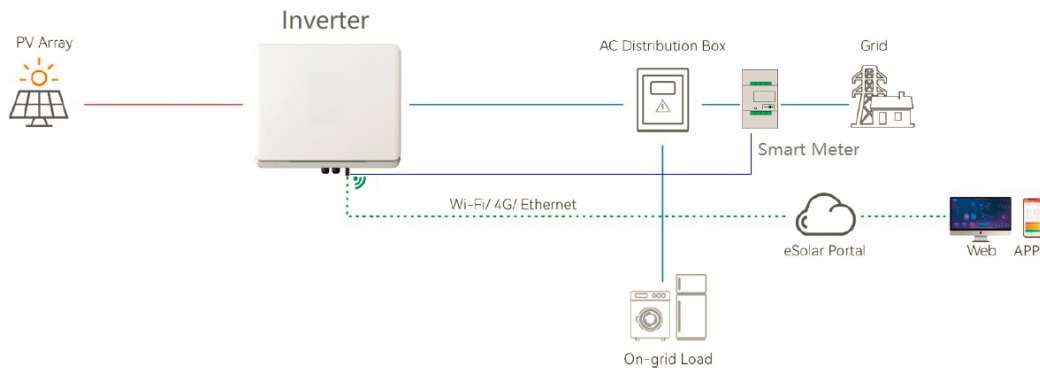
We Guangzhou Sanjing Electric Co., Ltd.
No.9, Lizhishan Road, Science City, Guangzhou High-tech Zone, Guangdong,
P.R.China

Declare under our own responsibility that the product:

R5, R6, H2, H1 series Inverter comply with G98-Amd. 6 (2021-09) Standard Sec.s 9.7.1, 9.7.2 and G99-Amd. 8 (2021-09) Standard Sec.s 9.1.7, 9.1.8 on "cybersecurity" requirements.

The SAJ cybersecurity statement is described as follows:

SAJ Inverter and external logic communications as summarized in the following scheme:



Where the main components involved and their main functions are explained in the following table:

Acronym/ name	Means and devices	Operations
PV Array	--	Convert light energy to direct current energy
Inverter	--	an apparatus which converts direct current into alternating current.
Wi-Fi/ 4G/ Ethernet	Communication module	transmission of data to cloud server, reception of commands/settings from external stakeholder
Meter	External Power Meter(s) (one or two)	Power measures

and the subjects/parties involved in communications with the SAJ Inverter listed in the following table, together with the purposes of the respective communications:

acronym/ name	meaning	function
Web/App	mobile device (via App), PC (via web portal)	monitoring of instantaneous and historical data, settings for special functions



1. **All communication between the inverter and the external power meter is over the appropriate serial line (RS485, CanBus) and is not directly connected to any device or system other than the inverter.**
2. **The only communication port between the inverter and the outside is constituted by the Communication module on the machine, the communication between inverter and the outside world can take place via an Ethernet line, WiFi or GPRS router according to the customer's request. An saj inverter is a not-constrained customer IoT device according to the definitions in ETSI EN 303 645 sec. 3.1.**
3. **The direct recipients/senders of communications with the inverter are:**
 - a. **in all cases the in-cloud server of SAJ - the communication is made secure by the use of Transport Layer Security technology on Communication module, and by the use of Secure Sockets Layer technology on User' s device side and Installer/ service web-tools side;**
 - b. **Third-party field devices, communication modules not provided by SAJ. - To communicate between the inverter and the third-party equipment on site, SAJ needs the communication protocol provided by the third-party, and has reached an agreement with the SAJ inverter. The data transmission can be protected by Transport Layer Security technology or Secure Sockets Layer technology ; The network security between third-party devices and third-party servers/clouds will be the responsibility of the third-party itself.**
4. **All communications between the esolar portal in-cloud server and the subjects/parties are cyber-protected by Secure Sockets Layer technology.**
5. **The cyber-security assessment of the SAJ Inverter was performed according to the ETSI EN 303 645 standard, and it is reported according to the Table B.1 form of the same standard:**



Clause number and title			
Reference	Status	Support	Detail
5.1 No universal default passwords			
Provision 5.1-1	M C (1)	yes	Customer-definable password
Provision 5.1-2	M C (2)	yes	Log in by obtaining random verification code through mobile phone SMS
Provision 5.1-3	M	yes	Request a dynamic password containing a 6-digit random number in the form of a mobile phone text message
Provision 5.1-4	M C (8)	yes	It can only be reset by requesting a dynamic password containing a 6-digit random number through the user's own mobile phone number in the form of a mobile phone text message
Provision 5.1-5	M C (5)	yes	
5.2 Implement a means to manage reports of vulnerabilities			
Provision 5.2-1	M	yes	
Provision 5.2-2	R	yes	
Provision 5.2-3	R	yes	
5.3 Keep software updated			
Provision 5.3-1	R	yes	
Provision 5.3-2	M C (5)	yes	
Provision 5.3-3	M C (12)	N/A	The final user can't update any sw component: only manufacturer assistance service personnel can do it remotely
Provision 5.3-4	R C (12)	yes	The manufacturer manages the updates of the systems by means of remote automatisms, selectively by type of machine or by activating special functions at the request of the user



Clause number and title			
Reference	Status	Support	Detail
Provision 5.3-5	R C (12)	N/A	See note at 5.3-4
Provision 5.3-6	R C (9, 12)	N/A	See note at 5.3-4
Provision 5.3-7	M C (12)	Yes	
Provision 5.3-8	M C (12)	N/A	See note at 5.3-4
Provision 5.3-9	R C (12)	N/A	
Provision 5.3-10	M (11, 12)	Yes	Confirmation by the user
Provision 5.3-11	R C (12)	Yes	
Provision 5.3-12	R C (12)	N/A	
Provision 5.3-13	M	Yes	
Provision 5.3-14	R C (3, 4)	N/A	No constrained device
Provision 5.3-15	R C (3, 4)	N/A	No constrained device
Provision 5.3-16	M	Yes	
5.4 Securely store sensitive security parameters			
Provision 5.4-1	M	Yes	
Provision 5.4-2	M C (10)	Yes	
Provision 5.4-3	M	N/A	Hard-coded identity not used in source code
Provision 5.4-4	M	Yes	
5.5 Communicate securely			
Provision 5.5-1	M	Yes	
Provision 5.5-2	R	Yes	
Provision 5.5-3	R	Yes	



Clause number and title			
Reference	Status	Support	Detail
Provision 5.5-4	R	N/A	
Provision 5.5-5	M	Yes	
Provision 5.5-6	R	Yes	
Provision 5.5-7	M	Yes	
Provision 5.5-8	M	Yes	
5.6 Minimize exposed attack surfaces			
Provision 5.6-1	M	Yes	
Provision 5.6-2	M	Yes	
Provision 5.6-3	R	Yes	
Provision 5.6-4	M C (13)	N/A	No debug interface accessible
Provision 5.6-5	R	Yes	
Provision 5.6-6	R	Yes	
Provision 5.6-7	R	Yes	
Provision 5.6-8	R	N/A	
Provision 5.6-9	R	Yes	
5.7 Ensure software integrity			
Provision 5.7-1	R	N/A	
Provision 5.7-2	R	N/A	
5.8 Ensure that personal data is secure			
Provision 5.8-1	R	N/A	No personal data transit through hw/sw
Provision 5.8-2	M	N/A	



Clause number and title			
Reference	Status	Support	Detail
Provision 5.8-3	M	N/A	
5.9 Make systems resilient to outages			
Provision 5.9-1	R	Yes	
Provision 5.9-2	R	Yes	
Provision 5.9-3	R	Yes	
5.10 Examine system telemetry data			
Provision 5.10-1	R C (6)	N/A	
5.11 Make it easy for users to delete user data			
Provision 5.11-1	M	N/A	No personal data are stored
Provision 5.11-2	R	N/A	No personal data are stored
Provision 5.11-3	R	N/A	No personal data are stored
Provision 5.11-4	R	N/A	No personal data are stored
5.12 Make installation and maintenance of devices easy			
Provision 5.12-1	R	Yes	The manufacturer or service personnel will assist the user to complete the installation on site
Provision 5.12-2	R	Yes	The manufacturer or service personnel will assist the user to complete the installation on site
Provision 5.12-3	R	Yes	The manufacturer or service personnel will assist the user to complete the installation on site
5.13 Validate input data			
Provision 5.13-1	M	Yes	
6 Data protection provisions for consumer IoT			



Clause number and title			
Reference	Status	Support	Detail
Provision 6.1	M	Yes	It only applies to the server/cloud side of the service
Provision 6.2	M C (7)	Yes	It only applies to the server/cloud side of the service
Provision 6.3	M	Yes	It only applies to the server/cloud side of the service
Provision 6.4	R C (6)	Yes	No personal data are stored
Provision 6.5	M C (6)	Yes	No personal data are stored
<p>Conditions</p> <ul style="list-style-type: none"> 1) passwords are used; 2) pre-installed passwords are used; 3) software components are not updateable; 4) the device is constrained; 5) the device is not constrained; 6) telemetry data being collected; 7) personal data is processed on the basis of consumers' consent; 8) the device allowing user authentication; 9) the device supports automatic updates and/or update notifications; 10) a hard-coded unique per device identity is used for security purposes; 11) updates are delivered over a network interface; 12) an update mechanism is implemented; 13) a debug interface is physically accessible. 			
<p>Status' Column:</p> <p>M: Mandatory provision</p> <p>R: Recommended provision</p> <p>M C: Mandatory and conditional provision</p> <p>R C: Recommended and conditional provision</p>			
<p>Support' Column:</p> <p>Yes: Implemented</p> <p>N/A: Not applicable</p>			

September 16, 2022

Date

Signature