Statement RED DA on GNSS products

Topic **RED Delegated Act regarding u-blox GNSS chips and modules**

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To u-blox Customers

1 Background

The Radio Equipment Directive 2014/53/EU (RED) applies to all radio equipment placed on the EU market. The directive now includes the RED Delegated Act (RED DA) on Cybersecurity (Commission Delegated Regulation (EU) 2022/30) which makes the cybersecurity requirements under Article 3(3)(d), (e), and (f) directly applicable in the member states as of 1 August 2025.

While u-blox GNSS chips are not considered as "products" under RED, u-blox GNSS modules have been assessed for and declared in conformity with RED Articles 3(1)(a), 3(1)(b), and 3(2) for the aspects of health and safety, EMC and radio performance. They are CE-marked accordingly.

2 Applicability of RED DA to u-blox GNSS modules

u-blox GNSS modules are receive-only radio devices. They are designed to:

- Receive satellite-based positioning signals (GNSS);
- Communicate locally with host systems over UART, I²C, or SPI;
- Operate without integrated connectivity (e.g. Wi-Fi, cellular, Bluetooth);
- Not store, process, or transmit personal data or payment information.

Art. 1(1) of the RED DA states that the "*essential requirement set out in Article 3(3), point (d), of Directive 2014/53/EU shall apply to any radio equipment that can communicate itself over the internet, whether it communicates directly or via any other equipment ('internet-connected radio equipment').* As listed above, u-blox GNSS modules are not capable of establishing or supporting internet connectivity, neither directly nor indirectly, nor do they require or use an active internet connection for any built-in functionality.

Regarding Art. 3(3)(e), u-blox GNSS modules are able to provide time or location data to the attached host system, but do not produce or aggregate further data that would identify users, nor allow storage of such data internally. Therefore, they do not qualify as "radio equipment [...] capable of processing [...] personal data" within the meaning of the RED DA.

Regarding Art. 3(3)(f), u-blox GNSS receivers are not designed to handle or influence any financial transactions or virtual money transfers and therefore are not covered by this article.

Conclusion: The RED DA, Article 3(3)(d) to (f), do NOT apply to u-blox's GNSS modules.

3 CE Marking and Declaration of Conformity

u-blox includes all applicable RED essential requirements in the technical file and the respective Declaration of Conformity (DoC). Regarding the requirements of RED DA u-blox may indicate the above-stated finding in the relevant DoC's with a statement such as:

"The requirements of RED Article 3(3)(d), (e), (f) are not applicable."

The CE marking remains unaffected.

4 Responsibility of Integrators

If a u-blox GNSS product is integrated into a product that is internet-connected or processes personal data, it is the responsibility of the final product manufacturer to assess and ensure compliance of the whole device with the relevant RED DA cybersecurity provisions. u-blox modules are delivered with extensive documentation to support integration and conduct conformity assessments.

We recommend to integrators of a u-blox GNSS module or chip:

- to consider compensatory security controls to be added when
  - processing and routing transmitted data from the module to the network or from the network to the module,
  - relating PVT data to a data subject, turning the PVT data into personal data.
- to further mitigate cybersecurity risks by
  - preventing physical access to the GNSS module;
  - disabling unused interfaces; not exposing internal interfaces;
  - registering with u-blox as a customer to receive relevant information notices (IN) and security advisories (IN-SA) for vulnerabilities and software updates;
  - updating the module with the latest Firmware;
  - relying on the security features of the product, such as the configuration lock and output message authentication.

Please consult the product integration manual for secure integration and operation.

5 Evaluation Kits and Development Boards

u-blox provides evaluation kits (EVKs) and development boards to support customers during the integration and testing of GNSS modules and chips. These products are intended solely for use by professional users in laboratories or engineering environments.

Evaluation kits used exclusively in such contexts are not considered "placed on the market" within the meaning of the RED. As clarified in EU guidance and industry best practices:

- EVKs are not finished radio products.
- They are not intended for end users or general commercial distribution.
- They are used only in controlled, professional environments for engineering and testing purposes.

Accordingly, these kits are not subject to RED, and CE marking is not required. However, u-blox may choose, on a case-by-case basis, to certify certain EVKs or development boards for marking purposes only, even if the product is not a finished radio device and remains outside the scope of RED compliance requirements.

6 Supporting Guidance

a) RED Delegated Regulation (EU) 2022/30
b) EN 18031-1/2/3 (2024)
c) REDCA Technical Guidance Note 01 (March 2020)
d) EU Commission's Blue Guide
e) Industry interpretations and regulatory workshops

7 Summary

u-blox continuously monitors applicable EU legislation. Based on current legal definitions and technical scope:

- GNSS chips are **not** subject to RED;
- GNSS modules are subject to RED but are **not** subject to RED DA cybersecurity clauses;
- GNSS evaluation kits and development boards are **not** subject to RED.

Compliance is ensured for all applicable essential requirements under RED. No EN 18031 cybersecurity assessment is required for GNSS modules or chips in their standalone form. Where an integrator builds an internet-connected device that includes a GNSS module or chip, the integrator must assess RED DA applicability for that system, and ensure compliance as required.