

## Proposal for Amendments to the Legal Inspection Requirements for Digital Still Image Video Cameras and Digital Cameras and 3 Other IT Products

By the Bureau of Standards, Metrology and Inspection (BSMI), Ministry of Economic Affairs

### Introduction:

To align with the international trend of mandating cybersecurity testing for information technology products, and in response to the increasing number of cybersecurity incidents involving IoT products being hacked both domestically and internationally in recent years, the BSMI plans to introduce additional cybersecurity testing requirements for network-connected security devices, as well as information and audiovisual IoT products. This initiative aims to enhance the cybersecurity resilience of critical IoT products in the domestic market, ensure product security, and safeguard consumer rights.

**Proposed date of implementation:** 1 January 2028

### Scope of covered products:

| Item | Description of Goods                                                                                                                                                                                                            | Inspection Standards (Note)                                                                       | C.C.C. Code<br>(the first 6<br>digits are the<br>same as HS<br>Code)<br>(For reference)                                                                                                                                                                                                                      | Conformity<br>Assessment<br>Procedures                 |
|------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------|
| 1    | Digital cameras or digital still image video cameras without network connectivity (inspection scope: including those with or without storage functionality; excluding medical devices or telecommunications terminal equipment) | 1. CNS 15936:2016<br>2. CNS 15598-1:2020<br>3. CNS 15663:2013: Section 5<br>“Marking of Presence” | 8525.81.90.10.1<br>8525.81.90.90.4<br>8525.82.90.10.0<br>8525.82.90.90.3<br>8525.83.90.10.9<br>8525.83.90.90.2<br>8525.89.90.10.3<br>8525.89.90.90.6<br>8525.81.10.20.6<br>8525.81.10.90.1<br>8525.82.10.20.5<br>8525.82.10.90.0<br>8525.83.10.20.4<br>8525.83.10.90.9<br>8525.89.10.20.8<br>8525.89.10.90.3 | RPC Scheme<br>(Modules<br>II+III)<br>or<br>TABI Scheme |

|   |                                                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                              |                                                             |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| 2 | Digital still image video cameras with network connectivity (inspection scope: including those with or without storage functionality; excluding medical devices or telecommunications terminal equipment) | 1、CNS 15936:2016<br>2、CNS 15598-1:2020<br>3、CNS 15663:2013: Section 5 “Marking of Presence”<br>4、For products with wireless connectivity or both wireless and wired connectivity, one of the tests listed in items(1), (2), or (3) shall be performed; for products with wired connectivity only, one of the tests listed in items (1) or (2) shall be performed.<br>(1) CNS 16120-1:2022, CNS 16120-2:2019, CNS 16132-1:2022, CNS 16132-2:2023;<br>(2) CNS 16190:2023;<br>(3) CNS 18031-1:2025, CNS 18031-2:2025 | 8525.81.90.10.1A<br>8525.81.90.90.4A<br>8525.82.90.10.0A<br>8525.82.90.90.3A<br>8525.83.90.10.9A<br>8525.83.90.90.2A<br>8525.89.90.10.3A<br>8525.89.90.90.6A<br>8525.81.10.20.6A<br>8525.81.10.90.1A<br>8525.82.10.20.5A<br>8525.82.10.90.0A<br>8525.83.10.20.4A<br>8525.83.10.90.9A<br>8525.89.10.20.8A<br>8525.89.10.90.3A | RPC Scheme (Modules II+IV or II+V or II+VII) or TABI Scheme |
| 3 | Routers, bridges, switches, network hubs, and gateways (inspection scope: including smart speakers and smart home assistants; excluding medical devices or telecommunications terminal equipment)         | 1. CNS 15936:2016<br>2. CNS 15598-1:2020<br>3. CNS 15663:2013: Section 5 “Marking of Presence”<br>4. For products with wireless connectivity or both wireless and wired connectivity, one of the tests listed in items (1) or (2) shall be performed; for products with wired connectivity only, the test specified in item (1) shall be performed:<br>(1) CNS 16190:2023;<br>(2) CNS 18031-1:2025, CNS 18031-2:2025                                                                                              | 8517.62.00.00.5                                                                                                                                                                                                                                                                                                              | RPC Scheme (Modules II+IV or II+V or II+VII) or TABI Scheme |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                               |                                                                                                |                 |            |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|-----------------|------------|
| 4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Other units of automatic data processing machines (inspection scope: including USB hubs and KVM switches; excluding medical devices or telecommunications terminal equipment) | 1、CNS 15936:2016<br>2、CNS 15598-1:2020<br>3、CNS 15663:2013: Section 5<br>“Marking of Presence” | 8471.80.00.00.7 | DoC Scheme |
| <p>Note:</p> <p>The listed product inspection standard is CNS 15598-1:2020, which is limited to testing products using AC power, rechargeable lithium batteries, or additional power conversion devices. However, in the following cases, the respective provisions shall apply:</p> <ol style="list-style-type: none"> <li>1. Products powered by button cell batteries shall comply with the relevant button cell battery requirements specified in CNS 15598-1: 2020.</li> <li>2. Products classified as personal music players as defined in Clause 10.6 of CNS 15598-1: 2020 shall comply with the requirements of that clause.</li> <li>3. Products classified as electronic displays as defined in Clause 7.2 of CNS 15598-1: 2020 shall comply with the requirements of that clause.</li> </ol> |                                                                                                                                                                               |                                                                                                |                 |            |

## **Description of the four kinds of conformity assessment procedures:**

### **1. Registration of Product Certification (RPC) Scheme (Module II + III)**

Under this procedure, domestic manufacturers or importers must have their products type-tested by the BSMI designated testing laboratories in advance (Module II) before applying for registration of their products. Manufacturers or importers will also be required to ensure by declaration that all products made at their manufacturing facilities or imported are in conformity with the prototypes submitted for type test at Module II stage, and the declaration procedure is called Module III (conformity-to-type declaration). The conformity-to-type declaration shall be drawn up by the manufacturer or the authorized local representative, declaring that the mass-produced products comply with the prototype as described in the type-test report.

Products will be allowed to use the Commodity Inspection Mark with the letter ‘R’ and the identification number given by the BSMI, after they are certified and registered with the BSMI. These products can then clear customs directly without any further inspection if not being sampled by RPC border check procedure. The application fee and annual fee for RPC are both NT\$5,000 (about US\$170) for each certification, and the RPC certificates are valid for three years. If there are any serial products, an extra NT\$3,000 (about US\$102) is charged for each application in each certificate.

The fees for type-testing vary by products and depend on the fee schedule of the testing laboratories.

### **2. Registration of Product Certification (RPC) Scheme: Modules II+IV, II+V, or II+VII**

For product subject to Modules II+IV, II+V, or II+VII procedures, not only the products shall be type-tested in advance (Module II) by the BSMI or BSMI-recognized testing laboratories, but the quality management systems of the production premises must be in conformity with Module IV (Full Quality Management System), Module V (Production Quality Management System) or Module VII (Factory Inspection).

For Module IV and Module V, a registration certificate in accordance with the CNS 12681 (ISO 9001) is required to be obtained from the BSMI, or certification bodies recognized by the BSMI. As for Module VII, a factory inspection report issued by the BSMI or BSMI-recognized factory inspection bodies is needed in the same way.

In addition, a declaration of conformity-to-type is also required to ensure that the mass-produced commodities are in conformity with that shown in the type-test report for all the above three IV, V, VII modules.

After being certified and registered by the BSMI, products will be allowed to use the Commodity Inspection Mark with the letter 'R' and the identification number given by the BSMI. Additionally, these products can clear customs directly without any further inspection if not being sampled by RPC border check procedures. The application fee and annual fee for RPC are both NT\$5,000 (about US\$170) for each certification, and the RPC certification is valid for 3 years. If there are any serial products, an extra NT\$3,000 (about US\$102) of application fee will be charged for every application in each certification. The fees for type testing vary by products and depend on the fee policies of the testing laboratories.

### **3. Type-Approved Batch Inspection (TABI) Scheme**

Under this procedure, manufacturers or importers shall have their products type-tested by the BSMI or BSMI-designated testing laboratories, and file an application for Type Approval to the BSMI or its branches.

After manufacturers or importers obtain a Type Approval certificate, they are required to file an application for batch inspection to the BSMI each time before their products are released from the production premises or arrive at the port of entry. The BSMI will then review the application and the related documents while additional samples may be required for further testing if it is deemed necessary.

After the products have passed the inspection, they will be allowed to use the Commodity Inspection Mark with the letter 'T' and the identification number given by the BSMI. The application fee for the Type Approval is NT\$3,500, and a Type Approval certificate is valid for three years. The fees for type testing vary by products and depend on the fee policies of the testing laboratories.

### **4. Declaration of Conformity (DoC) Scheme**

The manufacturer or importer shall obtain a test report from a BSMI-designated laboratory, prepare the relevant technical documents, and draw up a Declaration of Conformity. Both the technical documents and Declaration of Conformity shall be kept by the manufacturer or importer for an applicable period.

The manufacturer or importer shall apply to the BSMI or its branch for registration and obtain a registration number for the DoC marking.

The DoC marking printed by the manufacturer or importer must be affixed to the body of the products.

\*Further information on this scheme can also be found on the BSMI website:

<https://www.bsmi.gov.tw/wSite/lp?ctNode=9768&CtUnit=4132&BaseDSD=7&mp=2>

**Locations to apply for Type Testing:**

The BSMI-designated testing laboratories.

**Locations to apply for Registration of Product Certification:**

The BSMI or its branches.

**Locations to apply for Batch Inspection:**

1. Domestic manufacturers or consigned manufacturers: submit inspection applications to the BSMI or its branches according to the location of the production premises. If necessary, cross-jurisdictional inspections may be requested.

2. Importers or entrusted importers: apply to the BSMI or its branches for inspection according to the jurisdiction of the port of entry. If necessary, cross-jurisdictional inspections may be requested.

**Time required for Registration of Product Certification:**

14 working days. (This period does not include the time for corrective actions by the applicant due to deficiencies in the documents or samples. An extra 7 working days may be required if additional tests are required.)

**Related requirements:**

1. The revised inspection standards for listed products under items 2 and 3 will come into force from the date of announcement, and the previous version will be invalid beginning on 1 January 2028.
2. The revised conformity assessment procedures for listed products under item 2 will come into force from the date of announcement, while those for listed products under item 3 will come into force on 1 January 2028. The previous conformity assessment procedures for listed product under items 2 and 3 will be invalid beginning on 1 January 2028.
3. The mandatory inspection requirements for the newly added listed products after the amendment, including digital still image video cameras and digital cameras without storage function listed under items 1 and 2 with reference to CCC codes 8525.81.10.20.6, 8525.81.10.90.1, 8525.82.10.20.5, 8525.82.10.90.0, 8525.83.10.20.4, 8525.83.10.90.9, 8525.89.10.20.8, and 8525.89.10.90.3, will be subject to inspection, both imported and domestically manufactured, beginning on 1 January 2028. The conformity assessment procedures are Type-Approved Batch Inspection (TABI) or Registration of Product Certification (RPC).
4. For listed products under items 2 or 3 that have obtained test reports meeting national standards, government-issued surveillance system standards, or IoT cybersecurity-related standard requirements before the date of announcement, and whose original testing laboratories are designated testing laboratories of the BSMI, the type-test reports issued by the original testing laboratories may be used as documents for applying for BSMI type approval or RPC procedures after conducting additional difference tests based on the revised inspection standards and regional variance items.
5. Applications for TABI, RPC or DoC will be processed in accordance with the following upon the date of adoption:
  - (1) New applications or those who have not yet signed the DoC:
    - (a) Products originally listed for inspection:
      - (I) For listed products under item 1: A certificate will be issued upon approval by BSMI, and the certificate shall remain valid for three years from the date of issuance.

- (II) For listed products under item 2: Certificates obtained before 31 December 2027 in accordance with the previous conformity assessment procedures and inspection standards shall remain valid until 31 December 2027. Certificates obtained in accordance with the revised conformity assessment procedures and inspection standards shall remain valid for three years from the date of issuance. From 1 January 2028, applications must include relevant documents in compliance with the revised conformity assessment procedures and inspection standards. Certificates will be issued upon approval and shall remain valid for three years from the date of issuance.
- (III) For listed products under item 3: From the date of announcement, BSMI will accept applications for type approval or RPC procedures, provided that applicants submit relevant documents complying with the revised conformity assessment procedures and inspection standards. Upon approval, a product type approval or RPC certificate will be issued, valid for three years from the date of issuance (for certificates issued on or prior to 31 December 2027, the beginning of the 3-year validity will be 1 January 2028). For products displayed or sold in the domestic market before 31 December 2027, a DoC shall be signed, and such DoC will be invalid as of 1 January 2028.
- (b) Newly listed products for inspection: Applications for TABI or RPC can be made upon the date of adoption of this measure. Applicants shall provide relevant documents in accordance with the revised conformity assessment procedures and inspection standards. Upon approval, BSMI will issue a type-approval or RPC certificate, which will be valid for three years from the date of issuance (for certificates issued on or prior to 31 December 2027, the beginning of the 3-year validity will be 1 January 2028).
- (2) Those who have been certified:
- (a) For listed products under item 1: If the main model remains unchanged, additional series products or approvals may be applied for in accordance with the inspection requirements during the validity period of the certificate. For those meeting the extension requirements set forth in the “Regulations Governing Type Approval of Commodities” or the “Regulations Governing Registration of Product Certification”, the extended certificate shall remain valid for three years from the date of extension.
- (b) For listed products under item 2: The certificate holder shall apply to BSMI for certificate renewal before 31 December 2027, by submitting relevant documents complying with the revised conformity assessment procedures and inspection standards. The validity period of the renewed certificate shall remain unchanged. The standard field of the renewed certificate shall be annotated to indicate compliance with the revised inspection standards and information security level for identification purposes. Failure to renew within the deadline will result in the rescission of the RPC certificate in accordance with Subparagraphs 6 or 9, Article 42 of “The Commodity Inspection Act”, or the rescission of type approval in accordance with Subparagraph 1, Article 16 of the “Regulations Governing Type Approval of Commodities”. Certificates of type-approval or product registration obtained under the previous inspection procedures and standards that meet the extension requirements specified in the “Regulations Governing Type Approval of Commodities” or the “Regulations Governing Registration of Product Certification” may apply for extension before 31 December 2027, in accordance with

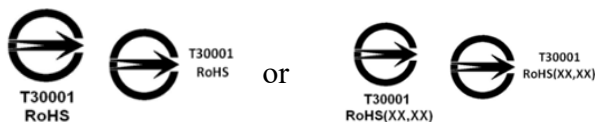
the original inspection requirements. The validity period of the extended certificate shall be until 31 December 2027. Applications for extension submitted to BSMI from 1 January 2028, onward shall provide relevant documents complying with the revised conformity assessment procedures and inspection standards.

- (c) For listed products under item 3: Before 31 December 2027, if a DoC was issued in accordance with the inspection procedures and standards prior to the amendments, the original DoC shall become invalid starting from 1 January 2028. For products imported before 31 December 2027 but not yet placed on the market, a certificate of RPC or a certificate of product conformity shall be obtained before the products may be made available on the market or sold starting from 1 January 2028.
6. If the product certification under listing has been rescinded in accordance with Subparagraph 9, Article 42 of the “Commodity Inspection Act” due to the circumstances specified above, the original type-test reports may be used as the conformity assessment documents for reapplying for RPC.
  7. The technical documents required for type testing shall comply with the requirements specified in the “Directions Governing Type Approval of Electrical and Electronic Commodities.”
  8. Fees for product type-testing: Charged in accordance with the fee regulations of the BSMI’s designated testing laboratory.
  9. Fees for product registration of product certification and type approval batch-by-batch inspection: Charged in accordance with the relevant provisions of the "Regulations Governing Fees for Commodity Inspection."
  10. The above listed products should indicate the presence of restricted substances in accordance with Section 5 "Labeling" of CNS 15663 (2013) (the example format shown in Table 1 and Table 2) on the body, packaging, label, or instructions. However, for those who provide (disclose) the presence of restricted substances via webpage, the URL link should be clearly stated on the body, packaging, label, or instructions. The location of the indication is not applicable to the provisions of Section 5.3 of CNS 15663.
  11. After the above listed products are approved by the BSMI for the issuance of certificate, the labeling requirements are as follows:
    - (1) Based on “Regulations Governing the Use of Commodity Inspection Mark”, the Commodity Inspection Mark shall be printed by the certificate holders. The identification number of the Commodity Inspection Mark consists of “A Letter (R),” “Designated Code (5 digits)” and “the presence conditions of the restricted substance” (e.g., RoHS or RoHS (XX,XX)).
    - (2) The identification number shall be placed below or right next to the graphic symbol and “the presence conditions of the restricted substance” shall be indicated in the second row.
    - (3) The product inspection mark is not designated with a fixed size, but it should be marked prominently on the product body in an appropriate proportional size. It should be made of durable materials, with clear and legible content that is not easily worn out, and it should be affixed permanently.

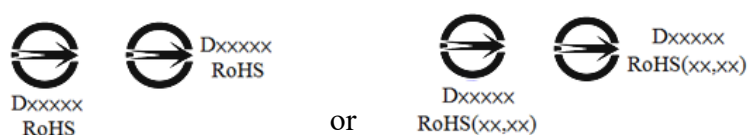
(4) For RPC scheme, the examples of the Commodity Inspection Mark are listed below:



(5) For TABI scheme, the examples of the Commodity Inspection Mark are listed below:



(6) For DoC scheme, the examples of the Commodity Inspection Mark are listed below:



(7) “RoHS” indicates “the content of restricted substance(s), other than exemptions stated in CNS 15663, does not exceed the reference percentage value of presence condition.

“RoHS(XX,XX)” indicates the content of restricted substance(s) (element XX, element XX, ...), other than exemptions stated in CNS 15663, exceeds the reference percentage value of presence condition.

Restricted substances: Pb, Cd, Hg, Cr<sup>+6</sup>, PBB, and PBDE.

Examples:

RoHS (Pb) indicates that the percentage content of Pb in certain parts of the commodity exceeds the reference percentage value specified in Annex A to CNS 15663.

RoHS (Cd, Cr<sup>+6</sup>, PBB) indicates that the percentage content of Cd, Cr<sup>+6</sup>, and PBB in certain parts of the commodity exceeds the respective reference percentage value specified in Annex A to CNS 15663.

12. The inspection standards of the products listed in the table shall be the version published in this announcement. If any updated version is available, the BSMI shall publish the implementation date of the updated version in a further announcement.
13. The C.C.C. Codes listed in the table are used for reference only. The commodity shall still comply with the requirements before entering into the market, even though its C.C.C. Code is identified differently by the Customs Administration, Ministry of Finance or International Trade Administration, Ministry of Economic Affairs.
14. Commodities with combined features or multifunctional products shall comply with the respective inspection standards and conformity assessment procedures of RPC scheme.
15. The medical equipment described in the table indicates the medical equipment regulated under the Pharmaceutical Affairs Act.
16. The telecommunications terminal equipment mentioned in the table is the telecommunications

terminal equipment regulated under the Telecommunications Act.

17. The listed commodities that have obtained vehicle safety testing reports issued by certification institutions authorized by the Ministry of Transportation and Communications are not subject to mandatory inspection by the BSMI.
18. The listed commodities with network connectivity refer to those connected to a network using the Internet Protocol (TCP/IP).

Table 1. Example of markings for the presence conditions of the restricted substances exceeds the reference percentage value of presence conditions

| Equipment name: Digital still image video camera , Type designation : XXX (Note)                                                                                                                                                                                                                                                                                                                                                                                   |                                                |                 |                       |                                               |                                      |                                             |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|-----------------|-----------------------|-----------------------------------------------|--------------------------------------|---------------------------------------------|
| Unit                                                                                                                                                                                                                                                                                                                                                                                                                                                               | Restricted substances and its chemical symbols |                 |                       |                                               |                                      |                                             |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Lead<br>(Pb)                                   | Mercury<br>(Hg) | Cadmium<br>(Cd)       | Hexavalent<br>Chromium<br>(Cr <sup>+6</sup> ) | Polybrominated<br>Biphenyls<br>(PBB) | Polybrominated<br>Diphenyl Ethers<br>(PBDE) |
| Circuit board                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Exceeding<br>0.1 wt %                          | ○               | ○                     | ○                                             | ○                                    | ○                                           |
| Case                                                                                                                                                                                                                                                                                                                                                                                                                                                               | ○                                              | ○               | Exceeding<br>0.1 wt % | ○                                             | ○                                    | Exceeding<br>0.1 wt %                       |
| Control Board                                                                                                                                                                                                                                                                                                                                                                                                                                                      | —                                              | ○               | ○                     | ○                                             | ○                                    | ○                                           |
| Accessory                                                                                                                                                                                                                                                                                                                                                                                                                                                          | —                                              | ○               | ○                     | ○                                             | ○                                    | ○                                           |
| <p><b>Note 1:</b> “Exceeding 0.1 wt %” and “exceeding 0.01 wt %” indicate that the percentage content of the restricted substance exceeds the reference percentage value of presence condition.</p> <p><b>Note 2:</b> “○” indicates that the percentage content of the restricted substance does not exceed the percentage of reference value of presence.</p> <p><b>Note 3:</b> The “—” indicates that the restricted substance corresponds to the exemption.</p> |                                                |                 |                       |                                               |                                      |                                             |

Table 2. Example of markings for the content of the restricted substances other than exemption do not exceed the reference percentage value of presence condition

| Equipment name: Digital still image video camera , Type designation : YYY (Note)                                                                                                                                                                               |                                                |                 |                 |                                               |                                      |                                             |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|-----------------|-----------------|-----------------------------------------------|--------------------------------------|---------------------------------------------|
| Unit                                                                                                                                                                                                                                                           | Restricted substances and its chemical symbols |                 |                 |                                               |                                      |                                             |
|                                                                                                                                                                                                                                                                | Lead<br>(Pb)                                   | Mercury<br>(Hg) | Cadmium<br>(Cd) | Hexavalent<br>chromium<br>(Cr <sup>+6</sup> ) | Polybrominated<br>biphenyls<br>(PBB) | Polybrominated<br>diphenyl ethers<br>(PBDE) |
| Circuit board                                                                                                                                                                                                                                                  | ○                                              | ○               | ○               | ○                                             | ○                                    | ○                                           |
| Case                                                                                                                                                                                                                                                           | ○                                              | ○               | ○               | ○                                             | ○                                    | ○                                           |
| Control Board                                                                                                                                                                                                                                                  | —                                              | ○               | ○               | ○                                             | ○                                    | ○                                           |
| Accessory                                                                                                                                                                                                                                                      | —                                              | ○               | ○               | ○                                             | ○                                    | ○                                           |
| <p><b>Note 1:</b> “○” indicates that the percentage content of the restricted substance does not exceed the percentage of reference value of presence.</p> <p><b>Note 2:</b> The “—” indicates that the restricted substance corresponds to the exemption.</p> |                                                |                 |                 |                                               |                                      |                                             |

Note: If the position of the label clearly indicates the relationship with the product, the column for device name and model number may be omitted above the label. Additionally, if the label applies to multiple models, their numbers can be listed in the same column.