Canadian Multistakeholder Process on Enhancing IoT Security
Health Canada's Consumer Product Safety Directorate Comment on Year-One Draft Report

Health Canada's Consumer Product Safety Directorate (CPSD) actively participated in this IoT initiative and applauds the success of its multistakeholder approach to towards enhancing IoT security.

While CPSD's mandate focuses specifically on consumer product safety, it is widely understood that the Internet of Things blurs the lines between cybersecurity, data privacy and product safety, possibly to the point where they can no longer easily or reasonably be considered in isolation. The concerns surrounding IoT are therefore complex, remarkably multi-faceted, multi-disciplinary, and well suited to the multistakeholder approach and the collaborative effort that the initiative fostered.

Network Resilience
The work done in identifying, exploring and prototyping possible technical solutions for mitigating IoT security vulnerabilities is commendable and encouraging. Although the central question was how to defend the Internet infrastructure from potential threats posed by compromised IoT devices in consumers' homes, CPSD acknowledges that these vulnerability-mitigating solutions also improve the security and safety of consumer IoT devices and of the IoT on the whole.

Labelling
CPSD recognizes the value in a labelling framework for IoT device security. Standards in this space are still in development and maturing, but CPSD believes that they will be central and essential to a successful labelling scheme. CPSD believes that some research around literacy and accessibility could be useful, and that potential insight could be gained from the successes/lessons learned from other labelling programs that have been implemented in Canada (e.g. ENERGY STAR Canada and EnerGuide).

CPSD will continue monitoring and engaging in standards development with regards to consumer IoT product safety

Consumer Education
CPSD agrees that consumer education and awareness will play an key role in enhancing the security of IoT and in enabling all stakeholders to take some responsibility in addressing risks. The 'Shared Responsibility Framework' provides a good illustration of how the collaboration between demand and supply sides of IoT Devices can work to address IoT concerns over the lifecycle of the device.

Next Steps
CPSD will continue to engage in the Multistakeholder Process and will continue to work towards IoT safety and security from a consumer product safety perspective.

Sincerely,

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