

**Brussels, February 14<sup>th</sup>, 2018**

**Subject: European draft regulation on cybersecurity**

Dear Vice-President Mr. Andrus Ansip,

As you know, EuroCIO is an independent association representing now 12 national CIO associations and major European companies. EuroCIO supports its members in their ability to integrate and master digital technology in the Digital Single Market with cybersecurity as one of the strategic pillars. Therefore, a *CyberSecurity Council* has been established some years ago.

The cybersecurity package unveiled last September by the European Commission was positively welcomed by EuroCIO members and its *CyberSecurity Council*, because it addresses above all a shared concern to strengthen the European approach on cybersecurity and to enforce global standards and harmonized best practices.

We need to clarify the governance and to assign a clear European and global mandate for ENISA and to reduce the fragmentation of the associated market. To further support the European Commission, EuroCIO is also interested to become part of the Permanent Stakeholders' Group, representing the users' needs.

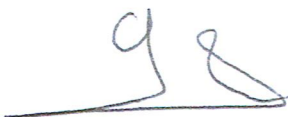
However, we would like to express as well the concern that it raises among EuroCIO, particularly regarding the management of security solutions certification schemes. Some of the certification levels developed by the main national agencies are providing real guarantees regarding cybersecurity and have been specified in a way that is completely independent of the interests of solution providers. EuroCIO urges that, in the same logic, the certification schemes set up by the EU will be built on the approaches already implemented and experiences obtained in the more advanced European countries.

The global certification schemes should incorporate several levels of security that are transparent and offer a way for more advanced countries to set higher norms than in other countries where such norms may not be politically or economically attainable. These schemes should in no way cause levels of security to be allowed to become lower once a certain level has been reached in a certain country or sector.

The national competences built up are indispensable for our member companies with high requirements for the protection of their information assets. This operational dimension constitutes a valuable asset for EuroCIO which has to be preserved. Furthermore, some of the EuroCIO member companies have activities related to national security challenges. The European legislative and regulatory framework will have to take this specific context into account.

Overall, the global approach is for EuroCIO one of the essential conditions to succeed in digital, which is the primary objective of our associations. However, the security certification schemes and competences developed by national agencies should be built on.

Yours faithfully,



Emmanuel Gaudin  
Co-Chairman EuroCIO



Thomas Endres  
Co-Chairman EuroCIO