IFIA International Federation of Inspection Agencies

CEOC INTERNATIONAL
INTERNATIONAL CONFEDERATION OF INSPECTION AND CERTIFICATION ORGANISATIONS

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INDEPENDENT CERTIFICATION PROVIDING TRUST IN CYBER SECURITY

As reliance on a digitally connected world increases and cyber-attacks become more sophisticated, harder to protect against, and more costly than ever, governments and citizens must be able to trust in the security and resilience of their critical infrastructure, systems, components and devices. A broad set of security certification schemes currently exist, or are being proposed, across Europe and around the world with no unified or combined solution available. This makes a comparison between the services and products difficult. The varying degrees of certification requirements coupled with many different approaches to standards frameworks has resulted in digital security placing governments and citizens at risk. The lack of transparency could induce detrimental behaviours on the market as the consumer cannot choose the right level of cybersecurity they need. In a digitalized world, there will be no safety without security.

IFIA and CEOC International support the European Commission’s efforts to raise the level of trust and security within the connected society. We believe that any approach proposed by the European Commission should:

- **Develop a regulatory framework with clear requirements:** to guide businesses in the design and creation of products while demonstrating evidence that these products are at the level of compliance expected by users.
- **Establish appropriate evaluation procedures based on risk and threat analysis:** both *what* is evaluated and *how* it should be evaluated. Specific evaluation procedures must be defined based on the assessed risk to citizens, industry, and government. Where higher levels of assurance are necessary, the level of evaluation must be more rigorous.
- **The conformity assessment method used to demonstrate compliance should be based on risk assessment and confidence needs:** policymakers need to determine the confidence level needed based on the risk of non-compliance and what market-driven mechanisms exist as mitigation tools for non-compliance. Part of a full analysis would include the pre-market structure and related resources that would be required.
- **Recognise third-party conformity assessment as a cost-effective policy solution as it provides the highest level of confidence and helps government leverage resources:** given the limited resources that governments currently have available for market surveillance, resulting in only 0,3% of the products entering the European market being checked by the authorities[1], the potential for non-conform mass market goods be “hacked” and controlled remotely can become a significant risk. Independent third-party conformity assessment is an effective tool to address the issue of non-compliant and unsafe products entering the market.
- **Recognise that independent certification provides a demonstrable level of compliance:** allows the user to have confidence in their choice of products and enables a fair competition between manufacturers and distributors. As cybersecurity levels cannot be tested and checked by the end user or the consumer, reliance on third party certification under the control of the security agencies and the market surveillance authorities can satisfy the need.
- **Ease the burden on industry and ensure trust for users:** harmonizing the diverging certification schemes currently in existence. The recommendation by the European Cyber Security Organization WG1 to establish a meta-scheme encompassing pre-existing certification schemes would reduce the cost and time-to-market by eliminating duplicative requirements.

[1] https://www.theparliamentmagazine.eu/articles/feature/eu-council-misses-opportunity-improve-product-safety

- **Harmonize accreditation rules and evaluation procedures**: will enable testing, inspection and certification bodies to carry out conformity assessment procedures (security evaluations) based on a uniform level of competence. Single market accreditation for all conformity assessment bodies will eliminate redundant accreditations, ensure common high-level competence and result in lower costs of compliance for manufacturers and consumers. At national level national security agencies would have to notify to the EU Commission the conformity assessment bodies.

IFIA and CEOC International members, with their global footprint and expertise already provide third-party security evaluation, testing, inspection, and certification services against clear regulatory frameworks and harmonized standards across a variety of areas. Establishing a harmonized approach to security testing and certification will enable Conformity Assessment Bodies to support industry in meeting the needs of building trust and verifying the security of their products and services.

ABOUT IFIA AND CEOC INTERNATIONAL

Founded in 1982, the International Federation of Inspection Agencies (IFIA) is the federation of organisations that provide inspection, testing and certification services internationally. IFIA currently represents around 60 of the world’s leading international testing, inspection and certification bodies representing over 300,000 employees and a combined turnover of roughly €23 billion.

Created in 1961, the International Confederation of Inspection and Certification Organisations (CEOC International), is the European trade association representing 29 members from 19 countries. Members are active in over one hundred countries around the world creating a truly international dimension. CEOC International members are accredited by public authorities to provide inspection, auditing and conformity assessment services for a wide variety of products and systems.