Letter from ECSO to European Institutions on the future organisation at European level in the cyber security domain

Brussels, 18 January 2019

This letter, co-signed by the ECSO Chairman and its Vice-Chairs representing the different categories of stakeholders (Public Administrations, Large Companies, SMEs, RTOs and Universities, Users, Associations and Regions) has been requested by the last ECSO Board to inform European Institutions about the common ECSO position and suggestions concerning the proposed Regulation for the creation of a Network of National Coordination Centres, a Cybersecurity Competence Community and a European Cybersecurity Industrial, Technology and Research Competence Centre (ECC).

ECSO (the European Cyber Security Organisation) has been created in June 2016 to facilitate the dialogue and cooperation between administrations, academia and industry in Europe on cyber security and support the cPPP (contractual Public Private Partnership) with the European Commission.

From the onset, ECSO has been unique in its membership. ECSO is an independent European body dedicated to cyber security, representing all the different stakeholders having federated and structured a large part of the European cyber security community, gathering national cyber security administrations, regions, research laboratories, national trade associations, users, large companies and SMEs, making it a fully-fledged public-private forum. Indeed, ECSO is the voice of the European Cyber Security Community. The move ECSO has created went even beyond its original target since national “subsets” of ECSO members have started gathering at national level and become recognized interlocutors of their national administration.

ECSO is unique in its goals: beyond giving advice to the EC through the elaboration of a SRIA for the cPPP, ECSO has defined a series of workstreams aimed at the development of a cyber security industrial policy, including certification & standards, improved understanding of users’ needs, training, education and awareness, regional development, market investments, funding of start-ups and support to SMEs growth, capacity and capability development at European scale.

Today ECSO is already bringing with the activity of its working groups and the link with its community:

a) a vision for the European cyber security by 2027 that links user demand, applied research and innovation as well as needed investment for capability development and capacity building;

b) a coordination of competence on technical, economic and societal issues as well as a view on needs from experts of the public and private sectors to develop, implement and use cyber security solutions and services.

With this, ECSO contributes actively to decrease market fragmentation and efficiently foster European investments for the development of ecosystems.
After 2,5 years of work, the following main results have been achieved:

a) ECSO is representing the main public and private stakeholders at European level in the domain with 250 contributing members end 2018 (reaching more than 2000 organisations through associations);

b) ECSO has developed a transparent, balanced and democratic governance allowing its members to participate into relevant Working Groups in order to develop common objectives and concrete actions;

c) ECSO is recognized as one of the main interlocutors of EU Institutions on policy, legislative, market and technology issues;

d) ECSO has developed Research & Innovation priorities (SRIA) for the 2017-2020 period, used by the Commission to draft the H2020 ICT Work Programme, and are well aligned with the final WP version. ECSO has also complied with cPPP commitments also for what concerns leveraging the investment factor well above the target of 3;

e) ECSO has elaborated and proposed a Meta-scheme for the EU Cybersecurity Certification Framework (then discussed by the Council’s HWP) as an input to the Cybersecurity Act;

f) ECSO has also launched other Working Groups supporting market knowledge, better identification of vertical/users’ needs, regional development, support to SMEs, development of skills and awareness with concrete actions (see companion paper for details and impact).

All ECSO members have invested time and money in this endeavour. Therefore, its achievements should be seen as an added value to the ECC and should not be lost at the end of the cPPP. The ECC should also be an amplifier of the initiatives ECSO has launched and developed, without losing the momentum set up by ECSO or duplicating its activities.

We are proud for having reached these first achievements, but also willing to improve our governance where needed and adapt the Working Groups process to reach higher expectations. A lot remains to be done. We have now to identify how the future European configuration will allow to continue the ECSO activities and success in the light of the ECC proposal.

ECSO is in favour of the missions of the proposed European Competence Centre and of the Network (article 3). About the Community, we think that membership should be restricted to those entities having the main Headquarters in Europe and being controlled by European capital. This is a prerequisite of the development of a true European digital autonomy, and absolutely needed to fulfill the trust requirements of sensitive information processing systems, both in the public and private environments.

Concerning the ECC governance structure, ECSO believes that a legal and organisational setup should be found to guarantee that the “Industry” (in the broad sense: large industry, SMEs, RTOs, academia etc) advice is duly considered in the ECC decision-making process. Such advice should be carefully considered for (inter alia) decisions on appointment of “Industry” representatives, adoption of priorities and multi-annual strategic plans, estimate of financing needs and sources, adoption of criteria and procedures for assessing Community members and establishment of working groups.

The cPPP was a first step in a European Public Private dialogue and cooperation. **De facto, with ECSO, we already went beyond the initial cPPP objectives** with our members from national public
administrations and the private sector, dealing with the different industrial policy and market issues. As the need for cyber security is growing, more coordinated investments and a **more structured cooperation are needed in particular in ECSO’s relationship with the European Commission**.

ECSO has been designed for the purpose of the cPPP, and must therefore **evolve in its structure, membership and governance to fit with the objectives, challenges and legal constraints of the new tools set up by the proposed Regulation on the ECC, the Network and the Community**. ECSO members are fully committed to envisage such steps provided the openness, collaborative spirit and result-driven approach of the organisation be preserved.

We understand that notwithstanding its limitations, ECSO has been welcomed and recognized by the EU Institutions and by Member States as a successful attempt to federate the efforts to increase the level of trust in the European digital economy. Therefore, we are confident in the willingness of the Commission to open the dialogue to help the continuation of this excellent initiative and make ECSO the cornerstone of the non-institutional side of the tools that the ECC and the Network aim to build.

Approved by the ECSO Board and signed by the ECSO Char and Vice Chairs representing all membership categories.

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