Brussels, 22 October 2018

Joint industry letter on trilogue negotiations on the Cybersecurity Act

The ongoing negotiations between the European Parliament and the Council to set up an EU cybersecurity certification framework will have profound implications for the future of Europe's industrial system, European companies being the first impacted by the final design of the framework.

Members of the co-signing associations are developing the ICT products, services and processes that will be the source for Europe's innovation, growth and competitiveness in core sectors of the digitised economy – industrial applications, connected and autonomous vehicles, medical technology and more. Protecting the safety, reliability and security of our companies' products and systems is part and parcel of their future success.

We have always been committed to these goals and have extensive experience with the EU's long-standing placing on the market and market surveillance frameworks. In this context, the cybersecurity certification framework should be a way to boost the EU's competitiveness – it should not prevent innovation due to a rigid approach. The framework should act as an opportunity for innovators to add value to their offerings and better compete in fast-changing markets, while improving security. The final Cybersecurity Act, therefore, should be flexible and future-proof, which means:

- **Industry involvement** needs to be a central element in the development of certification schemes. Without structured industry input in all phases of the schemes' development and the ability for industry experts to participate in the development of individual schemes as needed, the framework will not generate state-of-the-art or market-relevant outcomes. *We support the European Parliament's amendment to have ad hoc consultation groups for each scheme (Article 20a).*
- The framework **should not make schemes mandatory** from the start. The competitiveness of our members and their growth opportunities would be severely hampered if certification were to be conceived as a market access barrier, before the market itself is mature enough to warrant mandatory schemes. *We urge a careful reconsideration of the mandatory aspects introduced by the European Parliament (new article 48a).*
- **Self-assessment, including declaration of conformity**, has for decades been a tried and well-respected procedure for companies to demonstrate their compliance with essential health and safety requirements for connected products. In markets that have not yet been fully developed

or that are changing at an unprecedented pace, new features and products would take an inordinate amount of time to reach professional customers and consumers if they were to undergo lengthy and cost-intensive third-party certification procedures, especially for SMEs. *We support provisions of the European Parliament and Council introducing the possibility for self-assessment and regret its limited applicability to the most basic cybersecurity risk, which does not match the need for a substantial assurance level in most industrial applications.*

- **Interoperability with existing international agreements, regulations and standards** should be embedded in the development of future schemes. Our members need scale not just on the European market but also globally, and it is vital that European certification schemes do not reduce the addressable market. *We oppose Article 47(1)(b) of the Council's General Approach in the part providing for the possibility to introduce 'technical specifications or other cybersecurity requirements' in a scheme, if standards or technical specifications are not available.*

Our associations want to make the EU cybersecurity certification framework a success for both the security and the competitiveness of our industries, and therefore urge the co-legislators to focus on the above points.

This letter has been co-signed by the following associations:

ACEA represents the 15 Europe-based car, van, truck and bus manufacturers: BMW Group, DAF Trucks, Daimler, Fiat Chrysler Automobiles, Ford of Europe, Hyundai Motor Europe, Iveco, Jaguar Land Rover, Opel Group, PSA Group, Renault Group, Toyota Motor Europe, Volkswagen Group, Volvo Cars, and Volvo Group. *acea.be*

APPLiA – Home Appliance Europe represents home appliance manufacturers from across Europe. By promoting innovative, sustainable policies and solutions for EU homes, APPLiA has helped build the sector into an economic powerhouse, with an annual turnover of €44 billion, investing over €1.4 billion in R&D activities and creating nearly 1 million jobs. *applia-europe.eu*

CECAPI is the European Committee of Electrical Installation Equipment Manufacturers. Its objective is to promote and develop common technical, industrial, economic and political interests of the European electrical installation equipment industry. All equipment and components for electrical installations for residential and commercial use fall within its scope (including but not limited to: components for electrical installations and appliances, cable management systems, home & building electronic systems, intercom & video-intercom, circuit breakers, residual current devices). *cecapi.org*

CECIMO is the European Association representing the common interests of the Machine Tool Industries globally and at EU level. We bring together 15 National Associations of machine tool builders, which represent approximately 1,300 industrial enterprises in Europe (EU + EFTA + Turkey), over 80% of which are SMEs. CECIMO covers 97% of total Machine Tool production in Europe and about 33% worldwide. It accounts for almost 136,000 employees and a turnover of more than €26 billion in 2017. Approximately 60% of CECIMO production is shipped abroad, whereas around half of it is exported outside Europe. CECIMO assumes a key role in determining the strategic direction of the European machine tool industry and promotes the development of the sector in the fields of economy, technology and science. *cecimo.eu*

The European Association for the Taps and Valves Industry (**CEIR**) is the organisation representing a large number of European manufacturers in the field of taps, valves and fittings. CEIR Members are 12 national associations from 10 European countries and 14 European corporate companies. *ceir.eu*

COCIR is the European Trade Association representing the medical imaging, radiotherapy, health ICT and electromedical industries. Founded in 1959, COCIR is a non-profit association headquartered in Brussels (Belgium) with a China Desk based in Beijing since 2007. COCIR is unique as it brings together the healthcare, IT and telecommunications industries. Our focus is to open markets for COCIR members in Europe and beyond. We provide a wide range of services on regulatory, technical, market intelligence, environmental, standardisation, international and legal affairs. COCIR is also a founding member of DITTA, the Global Diagnostic Imaging, Healthcare IT and Radiation Therapy Trade Association. *cocir.org*

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies. DIGITALEUROPE ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include in total over 35,000 ICT companies in Europe represented by 63 corporate members and 39 national trade associations from across Europe. *digitaleurope.org*

The European Garden Machinery Industry Federation (**EGMF**) has been the voice of the entire garden machinery industry in Europe since 1977. With 30 European corporate members and 7 National Associations representing manufacturers of garden, landscaping, forestry and turf maintenance equipment, we are the most powerful network in this sector in Europe. *egmf.org*

The European Power Tools Association (**EPTA**) represents the power tool manufacturers active in Europe. The 27 companies represented by EPTA account for about 17,000 employees and approximately 95% of professional power tool sales (by value) in Europe. *epta.eu*

Euralarm represents the electronic fire and security industry, providing leadership and expertise for industry, market, policy makers and standards bodies. Our members make society safer and secure through systems and services for fire detection, intrusion detection, access control, video monitoring, alarm transmission and alarm receiving centres. Founded in 1970, Euralarm represents over 5,000 companies within the fire safety and security industry valued at €67 billion. Euralarm members are national associations and individual companies from across Europe. *euralarm.org*

Europump, the European Association of Pump Manufacturers, was established in 1960. It represents 17 National Associations in 14 EU Member States, Turkey, Russia & Switzerland. Europump members represent more than 450 companies with a collective production worth more than €10 billion and employing 100,000 people in Europe. The ever-improving performance of liquid pumps increases the productivity of end user sectors and contributes to competitiveness and growth. *europump.net*

Founded in 1953, **FEM** is the voice of European manufacturers of materials handling, lifting and storage equipment. The European industry employs some 300,000 people directly and has an annual turnover of nearly €62 billion (2015). In total, FEM represents 16 national associations and more than 1,000 companies covering around 80% of the market. *fem-eur.com*

Orgalime, the European Technology Industries, speaks for 45 trade federations representing the mechanical engineering, electrical, electronics and metal technology industries of 23 European countries. These industries directly employ nearly 11 million people in the EU and in 2017 accounted for some €2,000 billion of output. They represent over a quarter of the output of manufactured products and over a third of the manufactured exports of the European Union. *orgalime.org*

Pneurop is the European association of manufacturers of compressors, vacuum pumps, pneumatic tools and allied equipment, represented by their national associations. Pneurop members are national associations representing more than 200 manufacturers in 8 EU Member States, in Switzerland and in Turkey. The European market turnover for the business represented exceeds €20 billion. *pneurop.eu*

T&D Europe is the European Association of the Electricity Transmission & Distribution Equipment and Services Industry, representing the technology providers for the electricity network in Europe. T&D Europe currently represents 12 national associations (Austria, Belgium, France, Germany, Italy, the Netherlands, Norway, Portugal, Spain, Switzerland, Turkey and the United Kingdom and the 5 leading companies (ABB, GE, Ormazabal, Schneider-Electric and Siemens). The companies represented by T&D Europe account for a production worth over € 25 billion and employ over 200,000 people in Europe. *tdeurope.eu*