

Mrs. Ursula von der Leyen
President of the European Commission

Mr. Thierry Breton
European Commissioner

25th June 2024

Subject: Adoption Postponement of the European Cloud Services Certification Scheme

Dear President,

Dear Commissioner,

The proposed European cloud services certification scheme is a matter of concern for many European companies, including major groups and public administrations that are members of the main representative associations of digital solution users in Europe: Cigref in France, CIO Platform Nederland in the Netherlands, and Beltug in Belgium.

Indeed, many of these entities are awaiting the EUCS to offer a High+ certification level that provides a legal guarantee of immunity from non-European extraterritorial legislations. For example, Airbus, a member of Cigref, a predominantly Franco-German European company with its headquarters in the Netherlands, has explicitly declared its support for a European certification scheme that incorporates criteria for immunity from non-European legislations in its highest level. Our four associations have also expressed this need together in a letter addressed to Commissioner Thierry Breton on October 26, 2022.

In a situation where there is voluntary adherence to different certification levels, as the European Commission has expressed is the case with EUCS, there should be no need to deprive entities that need this High+ level of EUCS, which legally guarantees immunity from non-European legislations, to protect their most sensitive data from economic intelligence activities conducted by the intelligence agencies of major non-European powers. On the other hand, there is a need to allay worries with entities that do not need this High+ level of EUCS, that the trend towards more prescriptive use of certification will not compel them to make use of unnecessarily expensive Cloud services, which would impact their competitiveness.



In its current incomplete version, without criteria for immunity from non-European legislations, the EUCS does not provide any apparent added value compared to the current situation in terms of the security of cloud services offered by their main providers.

In this context, we wish to ask you to take the time to reflect and consult with professional users to align the different certification levels with users' needs, dispel doubts about the implementation conditions of the different certification levels, and finally gather a consensus on the nature of the certification levels that professional cloud service users need.

We therefore invite the European Commission to defer the adoption of a certification scheme, which adds little value in its current version, and to leave it to the next term of the European Commission to conduct the necessary work on the EUCS, taking the time needed to gather a broad consensus among the stakeholders, including our associations.

Yours sincerely,

C. Rapoport
President
Beltug

J.-C. Laroche
President
Cigref

M. Koning
President
CIO Platform Nederland



About our three associations

Beltug, Cigref, CIO Platform Nederland are the Belgian, French and Dutch CIO-associations; the communities of Chief Information Officers (CIO's) and other senior leaders that are responsible for digital technologies and digital transformations within private or public organisations. Our members are European business users of digital technologies; they acquire, implement, and use digital technologies in practise. We do not represent IT-providers and consultants.