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PROPOSAL FOR A REGULATION establishing the European Cybersecurity Industrial, Technology and Research Competence Centre and the Network of National Coordination Centres

EBF key points

Cybersecurity is of paramount importance for the banking sector in order to ensure the effective delivery of the Digital Single Market and safeguard the trust of both citizens and companies in digital services.

The European Commission initiative to create a European Cybersecurity Industrial, Technology and Research Competence Centre (Competence Centre) and a Network of National Coordination Centres (Network) bringing together national Cybersecurity Competence Communities to increase the competitiveness of the EU cybersecurity industry and turn cybersecurity into a competitive advantage of other European industries is considered by the European Banking Federation (EBF) as a very positive step.

The EBF believes that a European Centre and an EU-wide network relating to cybersecurity skills, technologies and services can play an important part in Europe's cyber independence and can be a strong lever to help increase the maturity of the IT security market and related users, to the benefit of all sectors of the European economy. The complementarity of the role of the Competence Centre and the Network (stimulate the development and deployment of technology in cybersecurity and complement capacity building efforts at EU and national level) with the work of ENISA (advising on cybersecurity research and innovation), as stated in the Proposal (Legislative Financial Statement, par. 1.5.4), is also appreciated.

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EBF key points on the Proposal for the European Competence Centre & the Network of National Coordination Centres

The financial sector, being a critical and mature sector in the cybersecurity ecosystem that can provide valuable input to the Centre's strategy, but also being a sector often targeted by cyber criminals and in continuous need of cybersecurity-skilled workforce that can benefit from the Centre's outputs, would like to kindly invite the EU institutions to take into account in the process of adoption of this proposal, the following issues:

◆ Objectives and tasks of the Centre

Training and education can be a strong lever to help increase the maturity of the EU IT security market and related users, also from the point of view of self-employed professionals and SMEs. For this purpose, the EBF proposes to add in Art. 4, par. 5, a second task as follows:

"(b) supporting European training networks to train more experts at national level and increase the general cybersecurity awareness level of workforce and businesses, including an aim to upgrade the cyber maturity level of SMEs and self-employed professionals."

◆ Links with the industry - Criteria for membership to the Cybersecurity Competence Community

Considering:

- the direct link between membership to the national Cybersecurity Competence Community (Community) and eligibility to be appointed as a member of the Industrial and Scientific Advisory Board of the Centre (Art. 18, par.1);
- the importance of the tasks assigned to the Industrial and Scientific Advisory Board, especially in providing strategic advice to the Competence Centre (Art. 20);
- the provision of the Centre and the Network to work towards standardization and certification processes related to cybersecurity certification schemes in the meaning of the Cybersecurity Act (Legislative Financial Statement, par. 1.5.4); and

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- the added value that the financial sector can bring in the development and deployment of cybersecurity knowledge, research and solutions,

the EBF sees a strong advantage from establishing a steady dialogue between the financial industry and the Competence Centre, the National Coordination Centres and the Cybersecurity Competence Communities. Therefore, we would welcome a clarification of the modalities that are envisaged to ensure, among others, the industry's (and hence the financial sector's) participation and contribution to the Community. More specifically, the EBF:

- would welcome a confirmation that associations representing sectors of the industry are included in the scope of the criteria for membership to the Community (Art. 8, par. 3) also pursuant to Art. 8, par.2;
- proposes that Art. 8, par. 3(c) is amended into "(c) training, education **and awareness-raising**" so as to clarify that cybersecurity awareness-raising activities, which are widely considered as very important for creating a cybersecurity culture in the European workforce and citizens as a whole, are also taken into account for membership to the Community;
- considering the Proposal's goal to develop European excellence in cybersecurity expertise and the provision of Art. 8, par. 3 that limits participation to the Community only to entities established within the Union European, the EBF would welcome a clarification of whether subsidiaries of non-EU companies can be accepted as members. If not, it is proposed to create a process whereby the input of non-EU companies as main current leaders in the field can be fed into the new scheme.

The banking sector looks forward to providing input in all stages of the discussion during the legislative process for this Proposal.

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About EBF

The European Banking Federation is the voice of the European banking sector, uniting 32 national banking associations in Europe that together represent some 4,500 banks - large and small, wholesale and retail, local and international - employing about 2.1 million people. EBF members represent banks that make available loans to the European economy in excess of €20 trillion and that securely handle more than 300 million payment transactions per day. Launched in 1960, the EBF is committed to creating a single market for financial services in the European Union and to supporting policies that foster economic growth.

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