

Joint Associations' Letter – European Cybersecurity Certification Scheme for Cloud Services (EUCS)

The European Association of CCP Clearing Houses (EACH), the European Central Securities Depositories Association (ECSDA), and the Federation of European Securities Exchanges (FESE) (the co-signatories) welcome the progress made on the European Cybersecurity Certification Scheme for Cloud Services (EUCS) and ask for a swift adoption of the scheme. We support the direction of the latest EUCS proposal that maintains three assurance levels as foreseen by the Cybersecurity Act and reflects discussions across sectors and inputs from industry so far.

We welcome the elimination of non-technical requirements from the latest EUCS draft, e.g. the requirements concerning the Protection Of European Data Against Unlawful Access (PUA requirements) which were blocking the advancement of the draft scheme. Such requirements¹ do not inherently enhance cloud security and introduce complexities and costs for companies operating across jurisdictions that would no longer be able to scale efficiently and leverage on cloud benefits and innovation opportunities. Raising barriers towards third-country providers will likely raise barriers in third countries for EU players as well.

It is our common belief that by setting baseline cybersecurity requirements, EUCS will be key in improving the overall security posture and resilience of cloud computing across the EU.

The adoption of the scheme will provide assurance that cloud services meet EU harmonized cybersecurity standards and requirements, reducing compliance burden and fragmented approaches. This will in turn increase trust and confidence among EU businesses and consumers in using cloud services.

As such, the co-signatories urge the European Commission and Member States to ensure that the latest EUCS draft is adopted formally as part of an Implementing Act without undue delay to enable a swift adoption of the scheme.

¹ PUA requirements:

- PUA-01: Primacy of EU law – The CSP operates primarily within the legal framework provided by the EU and its Member States, with precedence over laws from non-EU states;
- PUA-02: Operation in the EU – The cloud service is operated and maintained from the EU, and all CSC data is stored and processed in the EU;
- PUA-03: Controlling exchanges with employees and suppliers outside of the EU – The exchanges between the cloud service and its employees and suppliers are controlled specifically when the employee or supplier is located outside of the EU;
- PUA-04: Control requirements – Certified cloud services are operate only by companies based in the EU, with no entity from outside the EU having effective control over the CSP

About EACH

The European Association of CCP Clearing Houses (EACH) represents the interests of Central Counterparties Clearing Houses (CCPs) in Europe since 1992. EACH currently has 18 members from 14 different European countries and is registered in the European Union Transparency Register with number 36897011311-96. The list of EACH members is available [here](#).

If you have any questions on EACH, please contact EACH Secretariat at info@eachccp.eu or +32(0)22061260.

About ECSDA

The European CSD Association represents 40 Central Securities Depositories (CSDs) headquartered in 36 countries across geographical Europe. In pursuit of an efficient and risk-averse infrastructure for European financial markets, the Association has as its ethos to provide a forum that aims to increase dialogue and intellectual exchange on common topics of interest among CSDs and relevant external stakeholders. For more information regarding the role and activities of ECSDA, we invite you to consult the following [link](#).

About FESE

The Federation of European Securities Exchanges (FESE) represents 35 exchanges in equities, bonds, derivatives and commodities through 16 Full Members and 1 Affiliate Member from 30 countries.

At the end of April 2024, FESE members had 6,222 companies listed on their markets, of which 8% are foreign companies contributing towards European integration and providing broad and liquid access to Europe's capital markets. Many of our members also organise specialised markets that allow small and medium-sized companies across Europe to access capital markets; 2,021 companies were listed in these specialised markets/segments in equity, increasing choice for investors and issuers. Through their RM and MTF operations, FESE members are keen to support the European Commission's objective of creating a competitive and efficient Capital Markets Union.

For more information, visit the FESE [website](#). Follow FESE on [LinkedIn](#).