CSC'S STATEMENT ON THE EUROPEAN COMMISSION CYBERSECURITY PACKAGE

CSC – IT Center for Science Ltd. (CSC) is a government owned non-profit Finnish center of expertise in ICT developing, integrating and providing services for research, education, culture, public administration, and enterprises. As a key actor of the Finnish research system, CSC's services include HPC, data centers, data storage, curation, long-term preservation, data analytics, data publication, and data interoperability, as well as software development, network connectivity and research networks, and expert services.

As a national stakeholder on cybersecurity for research, education and IT services for government on both national and European level, CSC exercises its opportunity to give a statement regarding the future roles of ENISA, the EU Cybersecurity Agency.

Most of the current issues on cyber security are generic and cross the borders of member states, whereas common denominators are related to technology and the types of digital services offered. Risks related to cyber security are continually increasing, becoming more advanced and having more potential impact on IT services, and on the resilience of the member states.

Unfortunately, legal frameworks, statues, and operational support from public agencies have not been able to meet the challenges of the increasing threats. Legal frameworks for information security are fragmented, rambling and incompatible between the member states. The role of ENISA has been unclear and ambiguous in terms of information security, providing advice and services to administration, industry and citizens in member states

CSC supports the proposal that clarifies the role of ENISA, and harmonizes as well as develops a common European framework for information security. However, the new role of ENISA must be developed under the European Commission's careful guidance and that of the member states, to avoid perils of self-absorbed developments.

A trustworthy, agile and efficient European set information security certification could greatly benefit the ability to provide digital services in Europe. An ensured system to define requirements and accredited auditors in the member states should be developed.

Regarding the operational security, CSC considers ENISA to have an appropriate role in creating coherent European level policies and requirements for information security. Currently, the member states have been referred to security guidelines created by and for the United States.

CSC views that the option of creating an operational CSIRT at ENISA could be considered if more information of the scope and mission of such team would be available.

CSC considers that coordinating information security as such is not an adequate mission for a European agency. ENISA should have a clearly defined mission and full operational capabilities to safeguard and secure European digital services.