Netherlands Position Statement regarding the SOG-IS MRA in the context of the revised CCRA

The Netherlands Common Criteria Scheme (NSCIB), considering the ratification of the revised CCRA where international mutual recognition of certificates is based on evaluations that claim compliance to collaborate Protection profiles (cPPs) or Evaluation Assurance Levels 1 through 2, has determined their policy how to use cPPs in their scheme in relation to the European context.

The role of SOG-IS MRA in the European context

National competent authorities are collaborating within SOG-IS MRA at European level. Hence, SOG-IS MRA is the single point of contact for all stakeholders including the Commission when it comes to IT security product certification. This group provides a neutral and objective platform to *address todays trust challenge in a pragmatic, result-oriented manner*. SOG-IS MRA particularly promotes so-called "recommended" Protection Profiles that are of interest to all members and might possibly be EU mandated. They are harmonised by all members following an endorsement procedure and therefore *sustainably enforce the trust in the digital society and economy*.

High assurance certification

IT-security of products is essential in building the trust of citizens, businesses and administrations in the digital society, in particular while protection of privacy online has become a growing concern in the EU. Several EU legislations now mandate high assurance IT security product certification. The supporting PPs are developed by ESO or other bodies, published as SOG-IS MRA "recommended", and applied by SOG-IS MRA member schemes.

While the CCRA focusses on evaluations being fully comparable and repeatable, the SOG-IS MRA acknowledges that especially for the higher assurance levels, more evaluation effort is necessary that maximises the use of the evaluator's skills and capabilities. This sound expertise and experience within certain product categories/technical domains is established in cooperation with industry in technical working groups and is regularly proven by a thorough and technical assessment between the SOG-IS MRA members.

Compared to the CCRA, SOG-IS MRA allows mutual recognition of a larger range of assurance levels, allowing industry to seek a certificate recognised by several countries, and at the same time achieving, when necessary, a high assurance level. SOG-IS MRA is therefore beneficial to international trade, not only for EU industry but also for non-EU product providers.

Way forward

The Netherlands Common Criteria Scheme will make use of international collaborative Protection Profiles as far as they fulfil the specific needs of National stakeholders or the

European Community (governments, market and industry). This could mean that additional security functionality may be required and adjustments for higher assurance levels are needed.

Under the revised CCRA, certificates can only be issued against cPPs if the product exactly conforms to the security requirements as stated in the cPP[1]. This means a certificate issued under the CCRA cannot claim additional security functionality, or higher assurance components. In these cases the Netherlands Common Criteria Scheme will issue two (2) certificates based on a single evaluation for a compliant product where one will be CCRA cPP compliant and the other SOG-IS MRA compliant including the additional security requirements.

For non-cPP compliant evaluations, the Netherlands Common Criteria Scheme will continue, as before and in compliance with the SOG-IS MRA, to issue certificates beyond EAL2 as appropriate and to recognise certificates at the EAL4 level, or higher for specific technical domains.

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1   See CCRA Annex K.3