



CONFEDERATION OF INDUSTRY  
OF THE CZECH REPUBLIC

## Industry Letter in support of the immediate adoption of the European Cybersecurity Certification Scheme for Cloud Services (EUCS)

11/02/2025

**Ms. Henna Virkkunen**

Commissioner for Tech Sovereignty, Security, and Democracy  
European Commission  
Brussels, Belgium

Dear Commissioner Virkkunen,

On behalf of our Associations, we extend our congratulations on your recent appointment and express our optimism about your vision for Europe's technological sovereignty and cybersecurity. We represent a broad coalition of European businesses, including SMEs and start-ups, all of whom contribute to, and rely upon, the European Digital Single Market. Our members are committed to fostering a competitive, innovative, and resilient digital economy, in alignment with the EU's digital transformation goals.

In your new role, we would like to respectfully urge your support for the **swift adoption of the European Cybersecurity Certification Scheme for Cloud Services (EUCS)**. EUCS can act as a foundational tool for enhancing Europe's cybersecurity framework as well as improving the functioning of the Single Market. We are encouraged by the progress made to date and believe the latest draft of the EUCS seen by the industry (dated March 2024) made good progress in balancing between robust security standards and the inclusive, open-market principles that are critical for the growth and resilience of Europe's digital economy. Below, we outline several key reasons for our position:

### 1. Promoting Harmonized and Secure Cloud Adoption Across Europe

The EUCS provides a unified framework for assessing and certifying the cybersecurity of cloud services, which will enhance both trust and resilience. The EUCS currently supports the three assurance levels defined in the EU Cybersecurity Act: 'basic', 'substantial' and 'high', each increasing security requirements in scope, rigor and depth. As the draft EUCS attests, the requirements at assurance level 'high' are demanding and close to or at the state-of-the-art level, which makes them suitable for the most sensitive use cases.

By ensuring that cloud providers meet EU-wide cybersecurity standards, the EUCS will simplify compliance with regulatory and procurement rules, especially for European firms operating across multiple countries. This will reduce the complexity caused by regulatory fragmentation, creating a level playing field for companies of all sizes across the Digital Single Market. This also aligns with your desire to support effective implementation and simplification of the EU's cybersecurity aquis.

While public discussions regarding the EUCS have largely been focused on large cloud service providers, we would like to recall that the EUCS aims at enhancing the level of cybersecurity of a wide range of cloud services that implement all types of cloud capabilities: application, infrastructure and platform. Europe has a substantial number of small and medium Software-as-a-Service (SaaS) companies, start-ups and scale-ups that provide solutions in sectors like finance, healthcare, and business services, which would benefit from an EU-wide certification scheme.

### 2. Supporting Transparency and Security Without Discriminatory Requirements

We appreciate the recent EUCS draft's focus on essential security measures rather than political sovereignty requirements. The removal of ownership controls and the "Protection Against Unlawful Access" (PUA) requirements has allowed the EUCS to return to its core purpose—ensuring cloud security and resilience based on technical criteria. This balanced approach fosters trust among EU businesses and international

partners, preserving the EU's commitment to rules-based trade and avoiding unnecessary restrictions that could limit access to critical cloud services.

### **3. Enhancing Market Competitiveness and Innovation in both private and public sectors**

Europe's digital competitiveness relies on access to the highest-quality cloud technologies. The current EUCS draft supports open access to cloud providers from both within and outside the EU, ensuring that European businesses and public sector organizations have the widest range of secure cloud options to choose from. Restricting access to non-EU providers could inadvertently hamper competition and drive up costs, limiting growth opportunities for European businesses and preventing public sector organizations' ability to adopt innovative solutions to better serve citizens' needs. The March EUCS draft avoids these limitations by creating a balanced framework that preserves open competition while establishing robust security standards.

### **4. Clarifying the EUCS's Role in Cybersecurity Without Duplicating Data Protection Regulations**

We are pleased that the EUCS draft avoids duplicating requirements from regulations that already exist in data protection laws, such as the GDPR and the Data Act. This differentiation ensures that cybersecurity certification remains focused on technical security requirements, allowing data protection concerns to be addressed by existing regulatory frameworks. Such clarity will reduce compliance complexity for companies, enhance transparency for cloud users, and build confidence in the scheme.

### **5. Supporting companies in achieving and demonstrating compliance with new EU cyber regulations**

According to the EU Cybersecurity Act, Union legal acts or Member State laws can provide that a European cybersecurity certification scheme may be used for establishing the presumption of conformity with legal requirements. Considering the newly adopted EU regulations in cybersecurity that will place a significant compliance burden on companies operating in the EU in the following years (NIS2, DORA, CRA), we see EUCS as providing an opportunity for companies to demonstrate compliance with security requirements in these various regulations. EUCS can be leveraged in this way by cloud service providers, cloud service customers as well as regulators in order to streamline compliance efforts.

### **6. Advancing Europe's Digital Ambitions**

As noted in the recent report by Professor Letta, the EU's path forward rests on a foundation of technology diffusion, sustainability, and security. By adopting the EUCS in its current, technically-focused form, Europe will strengthen its capacity to adopt secure cloud capabilities without sacrificing market openness or innovation. This is particularly important for achieving the EU's ambitious target of 75% of Union enterprises adopting cloud services, big data, and AI by 2030. As progress towards meeting these targets remains challenging, the EU will benefit from fresh impetus to adopt new technologies, rather than possible hurdles reducing the appetite to use new technologies.

In light of the EUCS's potential impact on Europe's cybersecurity and digital transformation, we urge the swift adoption of the scheme as part of an Implementing Act. We are ready to further work with ENISA and the Commission to address any remaining points of disagreement, especially as regards provisions on contract law, to make sure the needs of cloud users who operate across borders are taken into account.

The recent delays have underscored the importance of moving forward with a harmonized, transparent, and non-discriminatory cybersecurity certification scheme that enables European businesses to thrive and innovate within a secure digital ecosystem.

We appreciate your balanced approach to cloud security and sovereignty, as well as your commitment to strengthening Europe's cybersecurity posture in a complex geopolitical environment. We look forward to collaborating with you to ensure a secure, resilient, and competitive digital future for all European stakeholders.

Thank you for your attention and support.

Sincerely,

**Signatories:**

1. [Allied for StartUps](#)
2. [European Services Forum](#)
3. [Association for Applied Research in IT \(AAVIT\)](#), CZECH REPUBLIC
4. [Confederation of Industry](#), CZECH REPUBLIC
5. [American Chamber of Commerce in Estonia](#), ESTONIA
6. [American Chamber of Commerce in Finland](#), FINLAND
7. [Association of German Banks](#), GERMANY
8. [eco - Association of the Internet Industry](#), GERMANY
9. [Irish Business and Employers Confederation \(IBEC\)](#), IRELAND
10. [American Chamber of Commerce in Italy](#), ITALY
11. [Italian Innovation and start-up ecosystem \(InnovUp\)](#), ITALY
12. [DigiTech Sector Association \(INFOBALT\)](#), LITHUANIA
13. [Nederland Digitaal \(NL Digital\)](#), NETHERLANDS
14. [Digital Poland Association \(Cyfrowa Polska\)](#), POLAND
15. [Polish Confederation of Industry \(Lewiatan\)](#), POLAND
16. [Startup Poland](#), POLAND
17. [Association for the Promotion and Development of the Information Society \(APDSI\)](#), PORTUGAL
18. [American Chamber of Commerce in Romania](#), ROMANIA
19. [Confederation of Romanian Industry \(Concordia\)](#), ROMANIA
20. [Slovak Alliance for Innovation Economy \(SAPIE\)](#), SLOVAKIA
21. [American Chamber of Commerce in Spain](#), SPAIN
22. [The Voice of Digital Industry \(AMETIC\)](#), SPAIN
23. [Spanish Start-up Association](#), SPAIN

*Allied* **FOR**  
**ST▲RTUPS**

**ESF**  
*European Services Forum*

**AAVIT**

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CONFEDERATION OF INDUSTRY  
OF THE CZECH REPUBLIC

**AmCham Estonia**  
American Chamber of Commerce Estonia

**AMCHAM**  
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