



EUTC Input to the Public Consultation on an EU Cyber Resilience Act

The European Utilities Telecom Council (EUTC) is pleased to provide an input to the above legislation. EUTC represents European electricity generation, transmission and distribution companies and associated vendors plus equivalent operations in public gas and water utilities.

The telecommunications monitoring and controlling these real-time operational networks have stringent security requirements appropriate for critical national infrastructures supporting services essential to life and the functioning of an advanced economy. However, as these telecommunications networks become ever more complex and intelligent, they present greater attack surfaces for malicious intrusion.

EUTC encourages the Commission to enact option 5 as presented in the Cyber Resilience Act (“horizontal regulatory intervention introducing cybersecurity requirements”). So far, the lack of regulatory intervention has not delivered a ubiquitous cybersecure rich ecosystem. Extremely cybersecure technology is therefore considered a niche market with prices and supply options correspondingly high. By intervening in the market as proposed in option 5, the Commission would be encouraging higher cybersecurity standards across the board whilst also normalising the pricing from a niche to a commodity product or service. The result would almost certainly be increased innovation and greater vendor choice. In the absence of such a mandate, lower cost devices and services will dominate the market place and there will generally be lower cybersecurity capabilities. Mandating cybersecurity standards will benefit European industry and every citizen and consumer.

The Directive on the security of Network and Information Systems (NIS) was introduced to improve cybersecurity capabilities nationally, across borders and for supervision of critical sectors (including energy). Energy utilities therefore have to meet mandatory cybersecurity standards. Energy utilities can only meet the NIS Directive’s requirement cost effectively for the benefit of those having to pay for the energy supplied if there is an effective market for cybersecure technology and devices. In the absence of regulatory intervention, highly secure cybersecure technology will continue to be a niche product or service and may only be available in the market if volume demands are encouraged.

There is a further benefit from mandating stringent cyber security requirements as it will help to avoid scenarios where malicious agents subvert third party devices and applications to cause catastrophic failures of the energy networks. Malicious events may involve, for example, subverting third party devices controlling access to telecommunications networks such that the telecoms networks collapse in a way which makes restoration extremely lengthy, sometimes requiring every site to be visited to manually reset or replace devices.

EUTC therefore urges the Commission to mandate cybersecurity requirements as a means of enabling critical sectors to deliver effectively obligations imposed by the NIS Directive.

The European Utilities Telecom Council (EUTC)



The European Utilities Telecom Council (EUTC) is the leading European Utilities trade association dedicated to informing its members and influencing policies on how telecommunication solutions and associated challenges can support the future smart infrastructures and the related policy objectives through the use of innovative technologies, processes, business insights and professional people.

This is combined with sharing best practices and learning from across the EUTC and the UTC global organization of telecommunication professionals within the field of utilities and other critical infrastructure environments and associated stakeholders.

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