



THE INTERNATIONAL TIC SECTOR SUPPORTS EFFORTS TO ADDRESS CYBERSECURITY IN CONNECTED DEVICES

The International TIC Sector would like to express its strong support for efforts to address cybersecurity in connected infrastructure, systems, components and devices, including Internet of Things (IoT). The TIC Sector includes those who perform testing, inspection, certification and other conformity assessment activities. We believe that a transparent and comprehensive regulatory framework for certification on cybersecurity would be beneficial for consumers, industry, and authorities alike. The emerging standards landscape as well as the increasing number of security incidents are good indications that such a framework is critically needed. To this end, the International TIC Sector asks that you consider the following recommendations when developing policies to address the connected market:

Ensuring Interoperability. Interoperability is a critical function in the smooth cooperation of securely connected devices. Rules and technical specifications applying to connected devices should require interoperability from their manufacturers.

Ensuring Safety. With the increasing digitalization and connectivity of products and machines we must do more than merely protect people from machines, but also machines from people in order to avoid unauthorized influence (cyber-attacks) from external sources. This requires that manufacturers, integrators, and operators of functionally-safe products and systems redefine the diverse measures of IT-Security in their development, manufacturing, and operating processes.

Level Playing Field. Manufacturers should be encouraged and rewarded for taking ownership in cybersecurity, securing their part of the supply chain by securing their products and services and building their cybersecurity capacity.

Regulation on cybersecurity needs to be the result of an inclusive discussion. In this highly connected environment that includes mobile workforce, consumers, critical infrastructure operators, industry and service providers, any regulatory efforts should include all relevant stakeholders and take into consideration current programs. The TIC Sector should be included in these stakeholder discussions, it plays a critical role in helping ensure products' compliance with cybersecurity requirements and other rules.

Compliance to regulatory frameworks will require the extension of existing and development of appropriate new evaluation procedures. Cybersecurity levels often cannot be tested by the end user or verified by the manufacturer. Equally, public authorities often do not have the necessary internal resources to conduct evaluations and have traditionally relied on TIC services. Independent third-party certification can help meet this need in a reliable and efficient manner. The U.S. EPA Energy Star program is an example of a voluntary public-private partnership that relies on independent third-party certification to help ensure ongoing compliance and the integrity of the Energy Star label. A similar program would benefit the industry and ensure compliance with the established framework.



Incorporating current certification schemes would reduce the cost and time-to-market for manufacturers and harmonize processes across industries. By leveraging proven certification schemes from various segments and ensuring evaluation rules and procedures are applied consistently, it would be possible to reduce the cost and time needed to develop a regulatory program and ensure fast implementation within industry.

[IFIA](#) is the trade federation representing the independent third-party Testing, Inspection and Certification (TIC) industry. IFIA members provide services across a wide range of sectors: consumer products, medical devices, automotive, energy, water, petroleum, mining and metals, food, agriculture among others. IFIA and its sister organization CEOC International have [recently merged](#) to form the [TIC Council](#), a global trade association that brings together a total of approximately 90-member companies and organizations active in more than 160 countries.

For additional information: <http://www.ifia-federation.org>

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