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Conformity assessment under eIDAS

Challenges for supervision

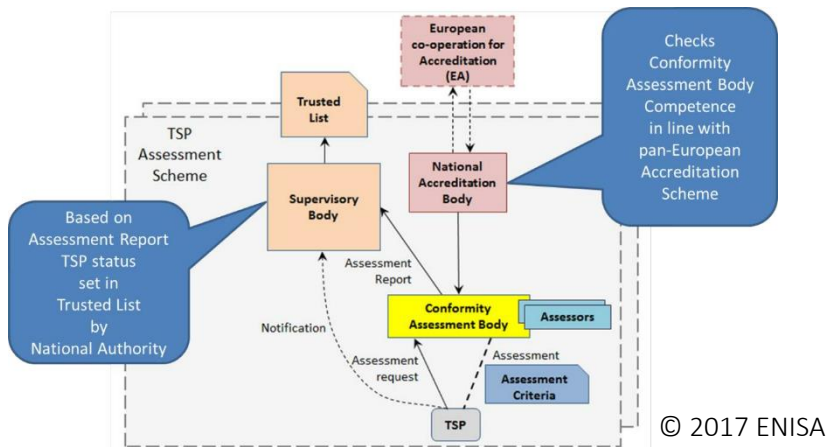
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Conformity assessment under eIDAS

TSP is customer of CAB but SB is main addressee of CAR

- Decision on granting qualified status based on CAR
- Regular analysis of CAR for qualified TSP





Different requirements for CABs

Different accreditation schemes

- All accreditations schemes based on ISO/IEC 17065
- Some accreditation schemes not based on ETSI EN 319 403 (NL, ± AT)
- Some accreditation schemes not based on eIDAS Art. 3.18 (FR, PT, SI, SK)

Different accreditation scopes

- eIDAS Regulation, possibly also implementing acts (e.g., PPs for QSCDs)
- ETSI policy and security requirements for TSPs
- ETSI certificate profiles, AdES creation/validation procedures etc.
- Various national specifications/regulations



Different quality of conformity assessment

Abstract eIDAS requirements vs. detailed ETSI requirements

- Some CABs evaluating TSPs against ETSI, others directly against eIDAS
- Different interpretations of abstract eIDAS requirements

Different accreditation schemes with/without ETSI EN 319 403

- Specific requirements (depth of stage 2 audit etc.) not always fulfilled

Not all CARs meeting requirements of ETSI TS 119 403-3

- Minimum content not always included in CARs

Length of CARs highly fluctuating

- Some CARs very elaborate, others rather insufficient

Occurrences of significant errors and omissions

- Need for SB to double-check statements of CARs



Consequences

Vicious circle

- Low quality of CAR ➤ low expenses for TSP ➤ higher market share for CAB
- pressure on other CABs ➤ decrease in quality of other CARs ➤ ...

CARs not comparable

- SB needs more detailed information
- SB requires evaluation reports with detailed documentation of all evaluation activities
- Huge differences even in elaborateness of evaluation reports
- Yet evaluation reports have positively contributed to quality of CARs



What do we need?

Harmonised accreditation scheme

- No accreditation of CAB without eIDAS-specific requirements

Harmonised conformity assessment scheme

- Inclusion of requirements at the national level
(identification of persons, suspension of certificates etc.)
- Technology-neutral framework
(acceptance of alternative controls exhibiting equal security)

Detailed information for SB (at the level of evaluation reports)



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Thank you for your attention!