



canso
civil air navigation services organisation

CANSO views on the European Strategy for Cybersecurity in Aviation

TRANSFORMING
GLOBAL ATM PERFORMANCE

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1. How your organisation (or represented organisations) will be taking advantage of the proposed strategy?

- A complex institutional framework could result in an overly slow and diffuse response. Greater clarity is therefore still required in the allocation of roles, responsibilities and accountability.
- We see a proliferation of regulatory actions that do not seem consistent with the need for a **clear, unambiguous legal framework** that allows all operators to adapt their organisations and their systems to the growing demand for security, in compliance with the principle of fair competition and uniform application of the rules.
- It is essential to reduce **the levels of complexity**, limiting the proliferation of authorities and stating a clear understanding of how the financial impacts resulting from regulatory work can be made compatible with the new performance process and charging scheme.

2. Where do you think the strategic actions need to be further expanded?

1. There is a clear need to better understand the interdependencies with other service suppliers that are not aeronautical operators (e.g. suppliers of critical services such as electricity and telecommunications services)
2. The strategies to mitigate internal threats encounter strict limits deriving from regulations. For example, effective background checks and vetting activities (especially for those infrastructures located landside or far away from airports) and the possibility of security controls towards employees of technological and maintenance service providers are limited by Personal Information Protection rules.

3. Which are the key factors for a successful implementation of the strategy?

- **The critical factors of success are linked to the degree of involvement, mutual reliance and willingness to collaborate together with common and shared objectives.**
- CANSO has long promoted a new vision in the relationships between regulators and regulated entities, based on the idea of seeking successful strategies through a win-win approach and taking into account the need for a gradual and sustainable process.
- **CANSO decided to participate with full commitment in the ESCP groups**, believing that it can give an effective contribution to achieve the security objectives avoiding excesses both of regulation and oversight, considering the context and in a risk-based posture.
- CANSO believes that key factors include also the financial efficiency of the measures
- **CANSO requests effective harmonization between the provisions of the NIS Directive and the rules on the security of information in the field of civil aviation.**

4. How can the ESCP/your organisation promote the strategy and the adoption of the proposed actions plan?

- ESCP is the ideal place to correctly identify, analyse and share all issues related to the implementation of the strategy.
- CANSO and EASA have long started an active dialogue, through bilateral exchanges and informal meetings.
- CANSO expects to:
 - Continue the dialogue
 - Refine the strategy (it is essential to clarify those uncertain areas, in particular in the overlap of rules, multiplication of obligations and other factors that could impair sustainability)

5. How do you suggest to monitor the progress?

- **The strategy requires a multi-level approach:**
 - Long process of regulatory innovation
 - Harmonised application of existing rules
 - Disseminate best practices and operating models
 - Continuous communication efforts (to strengthen transparency and build trust).
- **Since 2017 CANSO Europe has established a Cybersecurity Ad-Hoc Group of 60+ experts from European ANSPs in order to:**
 - Share best practices
 - Monitor initiatives and participation in regulatory projects.

Many thanks to all of you!



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