

13 december 2023

EUCC – RvA assessments



CSA – EUCC implementation

- ✓ The EUCC Implementing Regulation requires certification bodies and ITSEFs to be accredited.
- ✓ A certification body shall be accredited in accordance with standard ISO/IEC 17065 for assurance level 'substantial' and 'high'. For the level high, an NCCA authorisation is mandatory.
- ✓ The ITSEF shall be assessed through the accreditation of the testing laboratory in accordance with ISO/IEC 17025.



CSA - EUCC requirements

- ✓ We assess the ITSEF in accordance with ISO/IEC 17025 using the ISO/IEC 23532-1 (*Requirements for the competence of IT security testing and evaluation laboratories Part 1: Evaluation for ISO/IEC 15408*) for the full set of evaluation activities that are relevant to the assurance level and specified in ISO/IEC 18045 and ISO/IEC 15408.
- ✓ Both the certification body and the ITSEF should comply with ISO/IEC 19896-1 and ISO/IEC 19896-3 (*Competence requirements for information security testers and evaluators*).
- ✓ Not all ITSEF activities are suitable for ISO/IEC 17025. The activities that are not in line with ISO/IEC 17025 (such as site-audits) have to be transferred to certification bodies within 5 years (EA decision).



RvA assessments

- ✓ Q1 2024 Acceptance of applications for scope extensions
- ✓ Q1-Q2 2024 Pre-Assessment data (February – May 2024)
- ✓ Q2-Q3 2024 Assessments
- ✓ Delay in publication of the implementing regulation can result in a delay for the assessments.
- ✓ In January 2024 the RvA will publish information regarding the accreditation process
- ✓ We will send the currently accredited CABs (for Common Criteria) a direct mailing.



EUCC applications #1

- ✓ We expect scope extension applications from CABs who already have an existing RvA scope for CC.
- ✓ New CAB are requested to contact the RvA for information about the application proces → RvA contactperson Janet Kaljee.
- ✓ Application requirements for scope extensions:
 - Use the RvA application tool
 - For ISO/IEC 17025: clearly indicate the evaluation activities
 - Pilot projects: we need 1 or 2 pilot projects. Please consider the independence criteria.



EUCC applications #2

The RvA together with RDI decide - prior to accepting the application - if the pilot projects are suitable. Without suitable pilot project(s) the application for scope extension cannot be accepted.



Pilot projects – presented by NCCA

A pilot project used for scope extension for EUCC shall meet the following requirements:

- The product assessed falls within the scope, and if applicable the technical domain, of ICT-products for which accreditation is requested,
- The product is assessed at the assurance level (substantial/high and its associated AVA_VAN level) for which accreditation is requested,
- The product is assessed in accordance with the EUCC requirements defined in the Implementing Regulation. A product assessed under a national scheme that is recognised under the SOG-IS MRA may also be applicable,
- The product assessment results, i.e. the Evaluation Technical Report (ETR) or Certification Report (CR), shall not be older than 6 months from the time of scope extension application.



Evidence provided by the CAB – presented by NCCA

The following pilot project evidence need to be provided or otherwise made available:

- The final ETR, including all referenced evaluator evidence,
- The final Security Target,
- The project action list with agreed dispositions.

A CB shall in addition to the above listed project evidence also provide or otherwise make available:

- The final CR
- Certifier review evidences, e.g. reports and/or review meeting minutes.



17025 required documents

- ✓ **Report of internal audit (on the scope extension)**
- ✓ **Report of management review (on the scope extension)**
- ✓ Quality manual and general management system procedures
- ✓ The work instructions for all activities applied for
- ✓ General procedures that have been developed or modified
- ✓ A cross reference between the requirements of ISO/IEC 17025 and your quality system
- ✓ Modified chapter 1 of the report part A for this accreditation
- ✓ An example of a client report
- ✓ A statement and results of inter-laboratory comparison tests in which your laboratory has taken part
- ✓ Validation or verification reports for all tests applied for
- ✓ Results of internal quality controls for all requested tests



17065 required documents

- ✓ **Report of internal audit (on the scope extension)**
- ✓ **Report of management review (on the scope extension)**
- ✓ Quality manual and general management system procedures
- ✓ The internal work procedures and requirements used for certification
- ✓ General procedures that have been developed or modified (and not included in the manual)
- ✓ Competence requirements and qualification procedure
- ✓ A cross reference between the requirements of ISO/IEC 17065 and your management system
- ✓ Modified chapter 1 of the report part A for this accreditation
- ✓ An example of a certificate to the CSA scheme



Accreditation assessments

- ✓ The assessments are performed in close cooperation between RvA and RDI. The NCCA experts are (being) qualified as RvA assessors. The NCCA has access to all assessment results. RDI and the RvA have a signed agreement for this cooperation.
- ✓ The assessment starts with a pre-assessment. During this assessment we assess if the the documented system of the applicant meets the requirements for accreditation and if the pilot projects meet all requirements.
- ✓ Based on the results of the pre-assessment both the RvA and NCCA will decide if the initial assessment can be started.



Initial Assessments

ITSEFs

The initial assessment will consist of

- office assessment
- observation of the evaluation activities
- if the application for accreditation includes site audits: the witnessing of site audits

Certification bodies

The initial assessment will consist of

- office assessment
- witnesses of the certification activities including witness of site audits



Specific attention to the following:

- ✓ Impartiality/independence requirements of the CSA are more stringent than ISO/IEC 17025 and ISO/IEC 17065 requirements. Kindly note the restrictions on consultancy. For details see annex CSA.
- ✓ RvA shall use : EUCC accreditation requirements for ITsef activities at substantial assurance level (September 21, 2021). It may help you with preparations for the application
- ✓ The RvA will harmonise the ISO/IEC 17025 scopes, you may be requested to provide additional information.
- ✓ A GAP-analysis between the current accreditation requirements and the EUCC scheme related to the CABs quality system might help the implementation by the CAB and the assessment by RvA.



Accreditation of CABs located outside NL

Within the EU the CAB needs to apply for accreditation with the National Accreditation Body

RvA can not accept applications from CABs outside the Netherlands, unless the local NAB decides not to provide accreditation for this subject.



Vragen?



Blijf op de hoogte!



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