

OpenForum Europe
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European Commission

Re: Cybersecurity PPP public consultation

OpenForum Europe (OFE) is a not-for-profit, independent European based organisation which focuses on openness within the IT sector. OFE is particularly known for its leadership on open standards: not only is OFE a member of the Multi Stakeholder Platform on ICT standardisation, but has been invited by the Commission to chair its Rolling Plan Working Group. Within the MSP, we have actively contributed to the discussions on cybersecurity and have closely followed all the discussions around NIS, by attending the plenary meetings and contributing to the WGs work when relevant. Through our Cybersecurity Task Force, we provide input to the policy-developments, such as the contractual private-public partnership on cybersecurity, for which the Commission recently launched a public consultation.

OFE welcomes the high level objectives of the private-public partnership of ensuring a dynamic and efficient market that would allow end users to efficiently protect themselves, would ensure enough market flexibility to allow rapid response to new technologies and would stimulate competition and cooperation through mechanisms such as common reference architectures and open standards, with a view to encourage interoperability without stifling innovation.

As the Commission is looking for solutions to reach the objectives enumerated above, OFE considers essential to address the current market fragmentation of the EU market, while keeping it inclusive and encouraging wide participation. While the NIS platform Working Groups find value in the wide community participation and engagement, we consider that the cybersecurity market should reflect the same degree of inclusiveness. Supporting start-ups and small enterprises should be a continuous effort in order to achieve a self-sustained supply-side ecosystem for the NIS market. While aiming for that, a global perspective should be applied, in order to allow European

head-quartered enterprises to be competitive on the nowadays global dynamic market. This can be achieved by supporting SMEs to enter the market and also developing frameworks that allow training and skills gain.

It should also not be ignored that public procurement is a driver behind the cybersecurity market in Europe, and this can be further developed in order to encourage inclusiveness and avoid protectionism, which in the end affects European suppliers equally. Cybersecurity solutions typically go through EU distributors. Intermediaries or system integrators will collect a number of solutions and integrate them for their customer. Pure European players are successful in this sector. There is no differentiation between the manufacturer, sales, after sales, and distributor in the final solution and this allows European companies to acquire a global scale of operations. The current aspect of vertically integrated cybersecurity market can be addressed not by putting in place protectionism, but by encouraging cooperation and competition, enabling interoperable solutions and allowing innovation to benefit end users no matter where the solution comes from. Building a mutual beneficial ecosystem can come from linking SMEs and entrepreneurs with large and smaller companies and supporting them to create partnerships.

Advanced cyber systems and solutions depend increasingly on global data feeds for intelligence. Therefore less and less solutions can develop locally. Moreover, aiming to focus on European-based solutions comes with the challenge of defining a "European supplier". Deciding on the criteria which makes a supplier 'European' (e.g. the geographical location of a company's development capabilities, the location of its headquarter, the location of the company's R&D facilities, the source of investment etc.) can create confusion and negatively impact the cybersecurity market.

[OpenForum Europe](#) (OFE) is a not-for-profit, independent European based organisation which focuses on openness within the IT sector. We draw our support not only from some of the most influential global industry players, including Google, IBM, Oracle and Red Hat, but most importantly from across the European SME and consumer organisations and the open community. OFE also hosts a think tank, focussed around our global network of [OpenForum Academy Fellows](#), each contributing significant innovative thought leadership on core topics. Views expressed by OFE do not necessarily reflect those held by all its supporters.

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