

Everything you need to know about EU Cybersecurity Certification Scheme on Common Criteria (EUCC)

GLOSSARY

EUCC - EU Cybersecurity Certification Scheme on Common Criteria

CCRA - Common Criteria Recognition Arrangement

ENISA - European Union Agency for Cybersecurity

SOG-IS - Senior Officials Group Information Systems Security

CSA - EU Cyber Security Act

NCCA - National Cybersecurity Certification Authority

CAB - Conformity Assessment Body

CB - Certification Body

ITSEF - IT Security Evaluation Facility

RDI - Rijksdienst voor Digitale Infrastructuur

(Dutch Authority for Digital Infrastructure)

BSI - Bundesamt für Sicherheit in der Informationstechnik (Federal Office for Information Security)

NSCIB - The Netherlands scheme for Certification in the Area of IT Security

CCN - Centro Criptológico Nacional (National Cryptologic Center)

MRA - Mutual Recognition Agreement

RvA - Raad voor Accreditatie (Dutch Accreditation Council)

ENAC - Entidad Nacional de Acreditación (Spanish National Accreditation Body)

CoFrac - Comité Français d'Accréditation (French Accreditation Committee)

Introduction to EUCC

EUCC is the successor to the Common Criteria (CC) arrangements, expanded to include an EU-wide scope. EUCC is the first scheme under the EU Cyber Security Act (CSA), representing a significant advance in Europe's efforts to enhance cybersecurity regulation through third-party certification.

National Cybersecurity Certification Authorities (NCCAs) oversee and ensure compliance with the EUCC scheme for certificates issued by an ISO 17065 accredited Certification Body (CB) within a Conformity Assessment Body (CAB) and its respective member state. Companies seeking certification for their information and communication technology (ICT) products can apply for certification through a CAB, such as Brightsight.

Although the fundamental principles of EUCC evaluation and certification remain from CC, there are differences (see EUCC scope).

Brightsight continues to operate under multiple CBs across European locations and can help you with your upcoming EUCC certification.

TIMELINE:

UP TO FEBRUARY 27, 2026

CB: CURRENT SOGIS

SOGIS, MRA

STANDARD:

REGULATION:

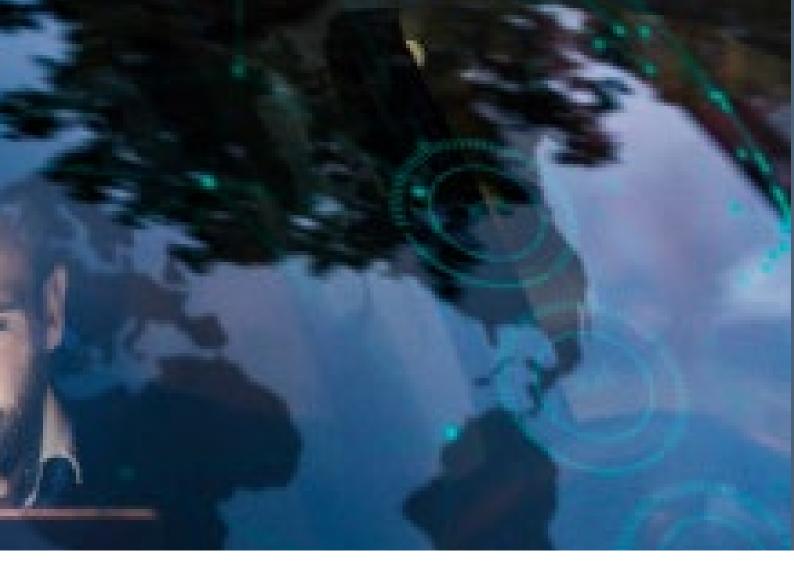
CC3.1 R5, CC:2022

FROM FEBRUARY 27, 2025

EUCC NCCA

EUCC

CC:2022



EUCC Scope

WHAT IS THE SCOPE OF EUCC?

The scope of EUCC encompasses a wide range of ICT products, including smartcards and similar devices (such as integrated circuits (IC), systemon-chip (SoC) or microcontrollers (MCU), hardware devices (such as a hardware security module (HSM), digital tachograph or payment point of interaction), and telecommunication and network devices (such as routers, switches or firewalls).

WHAT ARE THE KEY DIFFERENCES BETWEEN THE EUCC AND EU SOG-IS MRA?

The EUCC is built upon Senior Officials Group Information Systems Security (SOG-IS), which comprises schemes implemented across several EU countries, including NSCIB (the Netherlands), BSI (Germany), CCN (Spain), and ANSSI (France). However, unlike SOGIS, EUCC is a unified CC scheme covering all EU markets.

Distinguishing itself from SOG-IS, EUCC introduces:

- Authorization for each member state to establish a National Cybersecurity Certification Authority (NCCA) responsible for executing the EU's implementation regulation within the respective country.
- CABs: these are responsible for carrying out conformity assessments against applicable standards and can issue certificates accordingly.
 A CAB may function as a CB, an IT Security Evaluation Facility (ITSEF), or both.
 - An ITSEF a type of CAB appointed by the CB, also known as the evaluation laboratory performing the security assessment.
 - A CB a type of CAB responsible for certification based on the assessment conducted by an ITSEF.
- Monitoring and handling of non-compliances and non-conformities.
- Vulnerability handling and disclosure.



WHAT ARE THE ASSURANCE LEVELS WITHIN EUCC?

EUCC maps two levels of assurance:

- Substantial certifications that include AVA_VAN.1 or AVA_VAN.2
- High certifications that include AVA_VAN.3, AVA_ VAN.4 or AVA_VAN.5

WILL THE EVALUATION TECHNICAL REPORT (ETR) FOR COMPOSITION PERSIST FOR SMART CARDS?

The ETR for composition template from SOGIS can still be used for smart cards. This is indicated in the document, 'Composite product evaluation for smart cards and similar devices', listed in Annex I of the regulation. This document also indicates that a new EUCC template has been developed.

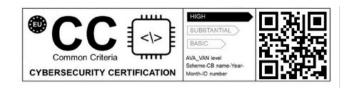
WILL SITE TECHNICAL AUDIT REPORTS (STARS) AND SITE CERTIFICATES REMAIN?

Since EUCC only focuses on products, it does not define the possibility of site certification. Reuse of site audit results is possible under certain conditions. What is important for this is coordination between the ITSEF, CB and NCCA, based on the specific situation.

A new EUCC document addressing sites is available on the European Union Agency for Cybersecurity (ENISA) website.

DOES THE CERTIFICATE FEATURE AN EUCC LOGO?

Yes, for EUCC this is the identification:



FEB 27, 2024

JUN 30, 2024

FEB 27, 2025

FEB 27, 2026

Accreditation and authorization of CABs commences

Final date for new CC 3.1 applications

CBs authorized under EUCC by NCCA can initiate certifications

EUCC is fully implemented

WHAT ARE THE TIMELINES FOR INTRODUCING THE EUCC?

- FEBRUARY 27, 2024: The first part of the EUCC
 Implementation Regulation comes into force.
 Accreditation and authorization of CABs, including
 CBs and ITSEFs, can commence. This includes
 accreditation by accreditation bodies such as RvA,
 ENAC, CoFrac, and DakkS according to ISO 17065
 and ISO 17025, as well as authorization by the
 National Cybersecurity Certification Authorities
 (NCCAs). Security evaluations can begin upon
 authorization.
- JUNE 30, 2024: This is the final date that new CC 3.1 applications for new product certifications can be started. Re-evaluations and re-assessments based on CC v3.1 evaluations can be commenced after this date with a window of up to two years from the initial certification date.
- **FEBRUARY 27, 2025**: The second part of the EUCC Implementation Regulation comes into force. Certification bodies authorized under EUCC by an NCCA can initiate the certification processes. This date follows the phase-out of CC R3.1, necessitating the use of CC:2022. Before this date, applications for certifications under SOGIS must be submitted and accepted by the scheme. These certifications must be completed before February 27, 2026.
- FEBRUARY 27, 2026: The EUCC Implementation Regulation is fully implemented. Current CC schemes under SOGIS can no longer issue certificates.

WHAT IS THE DURATION OF THE TRANSITION PERIOD FROM SOGIS TO EUCC?

All SOGIS schemes will cease by February 27, 2026.

WHAT WILL HAPPEN WITH CERTIFICATES ISSUED BY CURRENT SOGIS CERTIFICATION BODIES (CBS)?

They remain valid under the conditions in which they were issued.

WHAT WILL HAPPEN WITH ONGOING EVALUATIONS AND/OR CERTIFICATIONS?

- SOGIS CC 3.1 R5: All certifications must be completed before the transition policy deadline of February 27, 2026. Under NSCIB, certifications are expected to transfer to EUCC if their anticipated completion date is after February 27, 2025.
- **SOGIS CC:2022:** If a certification is not received by February 27, 2026, it must be transferred to EUCC.
 - Under NSCIB, certifications are expected to transfer to EUCC if their anticipated completion date is after February 27, 2025.
 - If the SOGIS CC:2022 certification is completed before February 27, 2026, it can be transferred to EUCC through the smart reuse of results, supported by RDI. In this case, a new application is required.

 CCRA: CCRA members are currently discussing a joint way forward. Brightsight can continue to offer certificates with a CCRA logo because we are also approved by CCRA certificate authorization schemes outside of Europe.ss

WHAT WILL HAPPEN WITH NSCIB?

NSCIB, along with CBs like BSI, CCN and ANSSI, will cease operations by February 27, 2026. While BSI, CCN and ANSSI will become part of a EUCC NCCA, NSCIB's certification responsibilities will be taken over by the new NCCA in the Netherlands, RDI. RDI operates as a dedicated certification organization under the Ministry of Economic Affairs, whereas NSCIB is part of the intelligence service under the Ministry of Internal Affairs. The transition to RDI is described in the memo 'Transition statement NSCIB-EUCC' published on the Dutch NCCA's website.

WHAT WILL HAPPEN WITH BSI AND CCN?

In Germany and Spain respectively, the names of BSI and CCN will remain unchanged. The processes and procedures of their SOGIS scheme will be transferred and adopted for the CSA NCCA under EUCC. Both BSI and CCN will also serve as CBs for the high assurance level. Other schemes such as BSZ, BSI-NESAS, Lince and ENS remain unaffected.



Recognition and Validity

IS THERE ANY CHANGE IN THE INTERNATIONAL RECOGNITION OF CURRENT CERTIFICATES?

The Common Criteria Recognition Arrangement (CCRA-2014) is still valid.

IS THERE ANY CHANGE IN THE DURATION OF CERTIFICATE VALIDITY?

The implementation regulation specifies that: "Certification bodies should decide on the duration of the validity of certificates, taking into account the life cycle of the ICT product concerned. The duration of validity should not exceed 5 years. NCCAs should work on harmonizing the duration of validity in the Union."

How can Brightsight support vou?

OUR SERVICES

Training/Workshops for EUCC:

- EUCC introduction: explains the context, processes and implementation.
- EUCC successor of SOGIS: highlights the differences between EUCC and SOGIS/CCRA.
- EUCC tailored training: the session is dedicated to discussing the specific implications for your organization and products.

Professional advisory: document creation support or ST writing.

Brightsight status

WHAT IS THE STATUS OF BRIGHTSIGHT'S ACCREDITATIONS AND AUTHORIZATIONS?

Brightsight has been authorized as a CAB sunder the EUCC in the following roles:

ITSEF:

- Dutch NCCA: RDI (authorized May 2025)
- Dutch Accreditation Council: RvA (accredited April 2025)

Brightsight will be authorized as a CAB under the EUCC in the following roles:

ITSEF:

German NCCA: BSI

Spanish NCCA: CCN

CB assurance level substantial:

Dutch NCCA: RDI

CB assurance level high:

• Dutch NCCA: RDI

Pre-evaluations for EUCC to help you efficiently prepare for the formal security evaluation.

Security evaluation for EUCC, also with smart reuse, where possible, to issue an EUCC certificate.

Post-evaluations, including alignment and assessment Impact Assessment Report.

Certification for EUCC: levels substantial and high (available by the end of 2025).



WHY CHOOSE BRIGHTSIGHT AS YOUR SECURITY LABORATORY?

With 40 years of experience with Common Criteria, the globally recognized IT security standard, we are the world's number one security evaluation service provider with over 700 security evaluations completed every year.

In May 2025, Brightsight got authorized as a CAB in the role of ITSEF at levels substantial and high. The authorization as a CB will follow soon. These two roles will operate impartially and independently, fully in line with the requirements of the EUCC Implementation Regulations (ISO 17065 and ISO 17025).

Leveraging our extensive experience and expertise gained from CC security evaluations, we have developed a comprehensive, step-by-step approach to guide you through each stage of the EUCC assessment and certification process. We are ready to assist you now with a full range of services, from training to pre-assessment and security evaluation, enabling you to fast-track your time to market.

OUR SECURITY LABS



Our numbers

10

Locations around the globe

50+

Security standards and schemes recognitions

40

Years of experience in security evaluations

250 +

Security evaluation experts

700 +

Security projects performed each year

© SGS Société Générale de Surveillance SA. (2024)

BUILDING DIGITAL TRUST

Brightsight
Brassersplein 2
2612CT Delft
The Netherlands

+31 (0)15 269 2500

brs.sales@sgs.com





