As Cloud users, we need voluntary High+ criteria
to make informed and free choices
and foster our competitiveness

Deliberations on the European Cybersecurity Certification Scheme for Cloud Services (EUCS) have been ongoing since December 2019. They concern notably the inclusion of immunity criteria ("*High+ criteria*").

Indeed, with the increasing use and sharing of data in our activities, the **Cloud has become and will increasingly be an essential component of our activities.** We need to obtain assurance that our data -in particular our most sensitive one- is adequately managed and secured by Cloud providers, both from a cyber and non-EU extraterritorial legislation or disruption perspectives.

Transparent and harmonised High+ EUCS criteria are necessary to provide us with adequate information and allow us to choose Cloud services that best fit our needs and obligations.

EUCS being a voluntary certification scheme, we will remain, as European Cloud users, able to freely choose our Cloud suppliers, based upon our needs and the information received about the level of protection that providers can offer.

Cloud providers not meeting the High+ criteria will remain fully able to offer their solutions to us without any market distortion. In fact, **Gaia-X Level 3** standards, which mirror High+ criteria, were developed on the basis of joint provider/user demand - they are already implemented and have not provoked any such distortion. We note with interest that several non-EU providers are progressively setting up corporate partnerships within the EU.

The inclusion of High+ criteria will provide a unified EU reference point. On the contrary, a multitude of **potential national standards would fragment** the eU market, negatively impact our operations and make transnational cooperation more difficult: we, as well as our supply chains, would have to manage standard divergences and duplicated administrative costs (compliance, audits, etc). The inclusion of High+ criteria will therefore reinforce the **EU digital single market,** foster our competitiveness and provide the necessary unified reference allowing to protect our most sensitive data.

As European Cloud users, we therefore call on Member States, ECCG experts and the European Commission to include High+ criteria in the EUCS scheme to enable our freedom of choice and contribute to a stronger and more competitive EU.

At the very least, we urge to take the time needed to consider European cloud users' requirements and avoid rushing into any detrimental decision for EU companies.