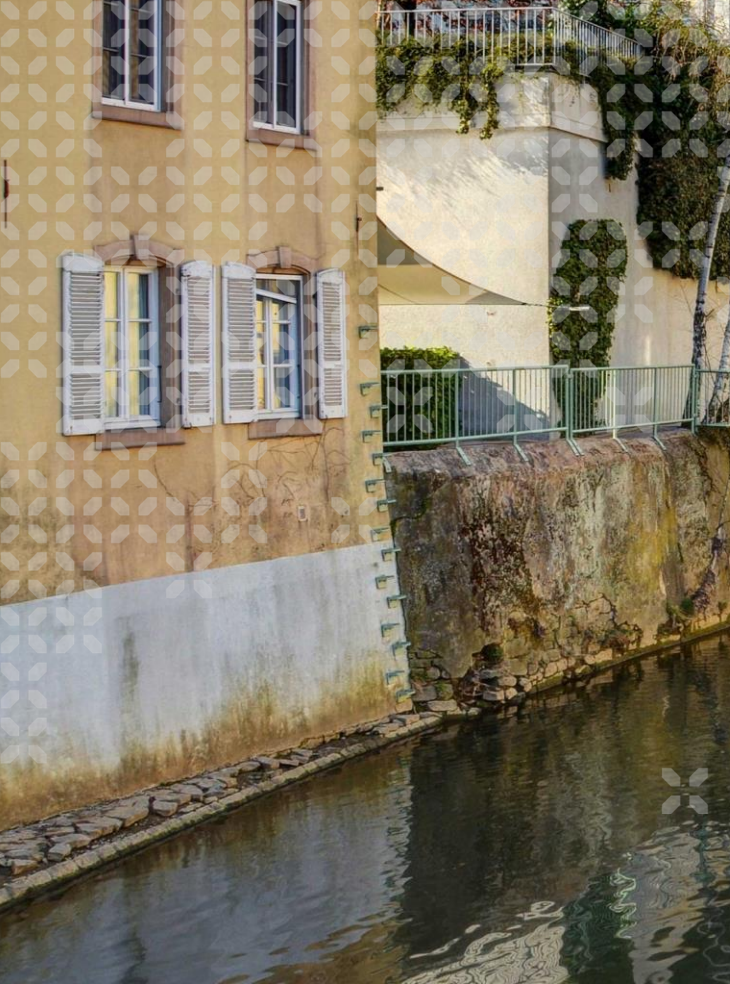




Increase cybersecurity maturity while leveraging synergies through coordination, collaboration and information sharing

*François Thill, Director cybersecurity and digital technologies,  
Ministry of the Economy*



# Introduction - European assessment

# Introduction – the sad facts

## The current situation

- **Cybersecurity is increasingly discriminatory in terms of complexity and costs**
- **Experts in cybersecurity are scarce, and still they are working in silos**
- **Individual “Threat hunting” is the “new” normal, making scaling difficult**
- **CTI feeds are proprietary, not interoperable and most probably biased**
- **The cybersecurity data economy is an oligopoly preventing innovation and research, excluding SME**
- **80% of the economy is at risk.**

# Introduction – market failures

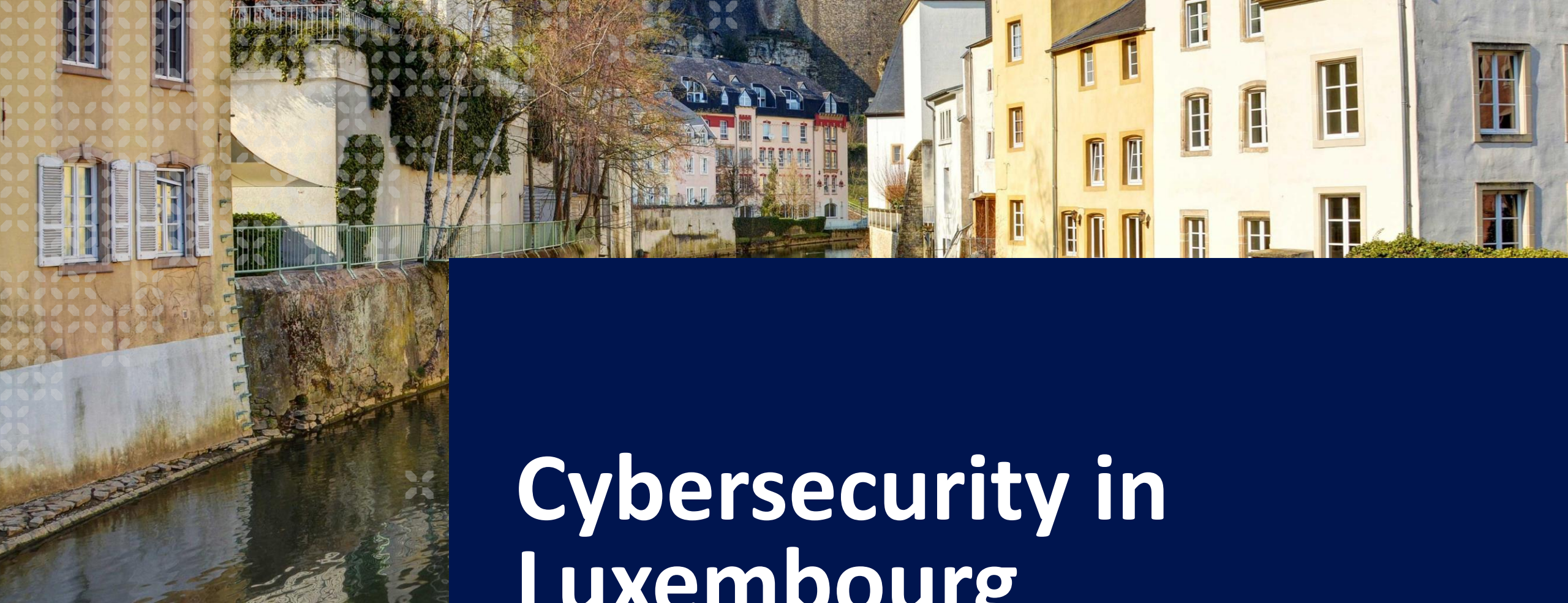
## Asymmetry of information

- **Cybersecurity is a data economy** – you need IOC to detect malicious activities. They generally come with expensive and proprietary data feeds running on proprietary software.
- **SMEs are not fully aware of their cybersecurity exposure** given they have no or little information about current cyber threats that can affect them and do not know which security measures should be effectively implemented.
- SME don't have the information what security measures are effective and efficient.
- Due to a lack of availability, accuracy and real-time threat information, **automatic (unattended) cybersecurity services for data processing activities cannot be designed** – innovation is not happening in this area.
- **Risk management, our main governance tool is mainly based on suppositions** as everybody starts with a blank page

# Introduction – market failures

## Coordination failure

- **Cybersecurity providers don't define and adopt common practices to reach interoperability all along the value chains.** There is a strong fragmentation of SOC or CSIRT providers in the different market segments of the cybersecurity market.
- **The same is true for governance, risk management is an individual task. Governance decisions rely on the aggregation of diverging subjective appreciations.**



# Cybersecurity in Luxembourg

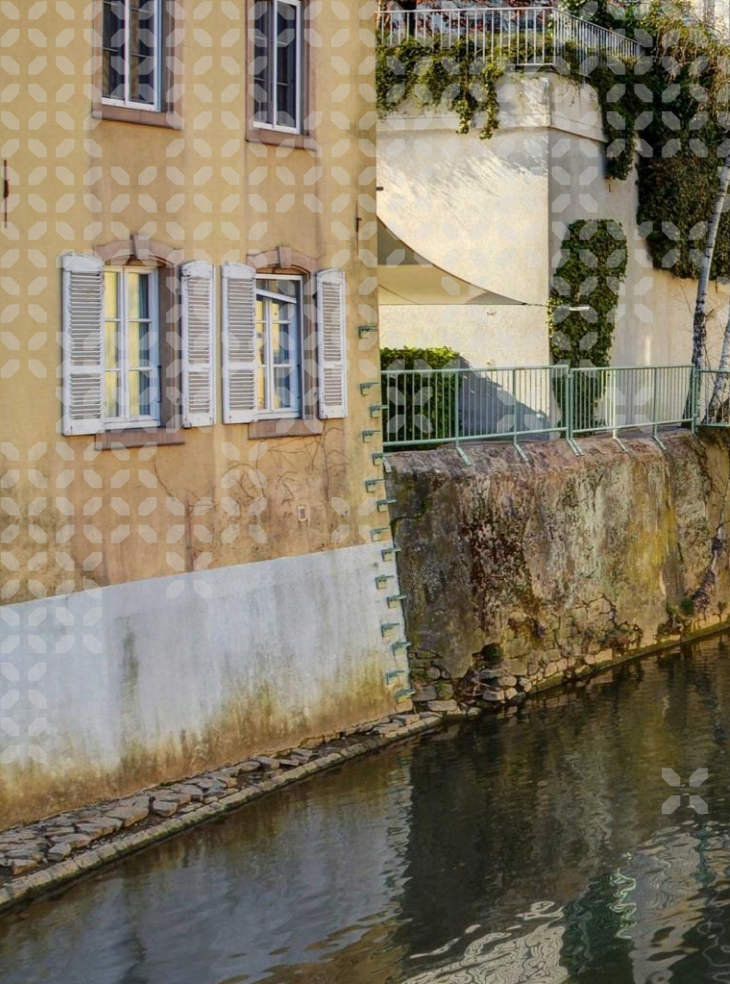
# Cybersecurity in Luxembourg

- Since 2017, the HCPN is heading the «comité interministériel de coordination en matière de cyberprévention et de cybersécurité ».
- The members contribute, according to their mandates, to the creation and transposition of the national cybersecurity strategy
- The main actors include Ministry of State (HCPN, SREL, ILR, SMCPN), Ministry of Foreign Affairs (Diplomacy, DoD), Ministry of the Economy (DCESI, LHC), Ministry of Digitization (CTIE)

# Cybersecurity in Luxembourg

- Since 2014, Luxembourg also has a
  - **Cyber Crisis Plan**
  - **CERC «cellule d'évaluation du Risque Cyber»**





# Coordination under NIS2

# Coordination under NIS 2 - international

The **HCPN** assumes the following roles:

- **single point of contact** (liaison function to ensure cross-border cooperation)
- **Member of the Cooperation Group** (It supports and facilitates the strategic cooperation and the exchange of information among EU Member States, provide “harmonized” guidance)
- **Member of CyCLONE** (The European cyber crisis liaison organization network is a cooperation network for Member States national authorities in charge of cyber crisis management. )

# Coordination under NIS 2 - national

**HCPN:** Overall crisis management

**GovCERT:** CSIRT for public administrations and services, public establishments and critical entities under Directive (EU) 2022/2557

**ILR:** National authority (the regulator)

**CIRCL:** CSIRT for all entities not covered by GovCERT and CSIRT for Responsible vulnerability disclosure of ICT products and services



# Collaboration under NIS2

# Collaboration under NIS2

## The goal of collaboration

- Inclusive capacity building
- Collaborative Risk management (principles of proportionality and necessity) for effective governance
- Incident detection, management and containment at all levels
- Crisis prevention and management (including cross-border)

# Collaboration under NIS2

## The collaborations that are needed under NIS2

- EU – HCPN – ILR – CSIRT (crisis and major incident management)
- ILR – CSIRT – OES and OIS
- Chambers and federation – OES and OIS
- CSIRT – Managed IT and cybersecurity service providers
- Managed IT service providers – managed cybersecurity service providers
- Managed IT and cybersecurity service providers – OES and OIS
- CSIRT – ISP (identification of entities)



# Information exchange requirements under NIS2

# Information exchange under NIS2

## HCPN

- Manages crisis and coordinates national entities
- Decides whether there is need for public awareness to prevent significant incidents
- Provide national actors with guidance created by the European Coordination Group



# Information exchange under NIS2

## HCPN - CyCLONE

- Support the coordinated management of large-scale cybersecurity incidents and crises at operational level
- Develop a shared situational awareness for large-scale cybersecurity incidents and crises
- Coordinate the management of large-scale cybersecurity incidents and crises and support decision-making at political level in relation to such incidents and crises

# Information exchange under NIS2

## ILR – The national authority

- Regulate and guide essential and important entities so that they take appropriate and proportionate technical, operational and organizational measures to manage the risk
- Inform the CSIRT and SPOC about significant and/or cross border incidents

# Information exchange under NIS2

## CSIRT – (GovCERT and CIRCL)

- CSIRTs share information with IT and cybersecurity service providers as well as with OES and OIS
  - a) Situational awareness
  - b) Vulnerabilities (external scans)
  - c) Alerts on threats, vulnerabilities, IOC, forensic evidence
- CSIRT will provide information exchange platforms (MISP, Open CS data space,...)
- CSIRT can be asked to scan internal networks and give technical guidance

# Information exchange under NIS2

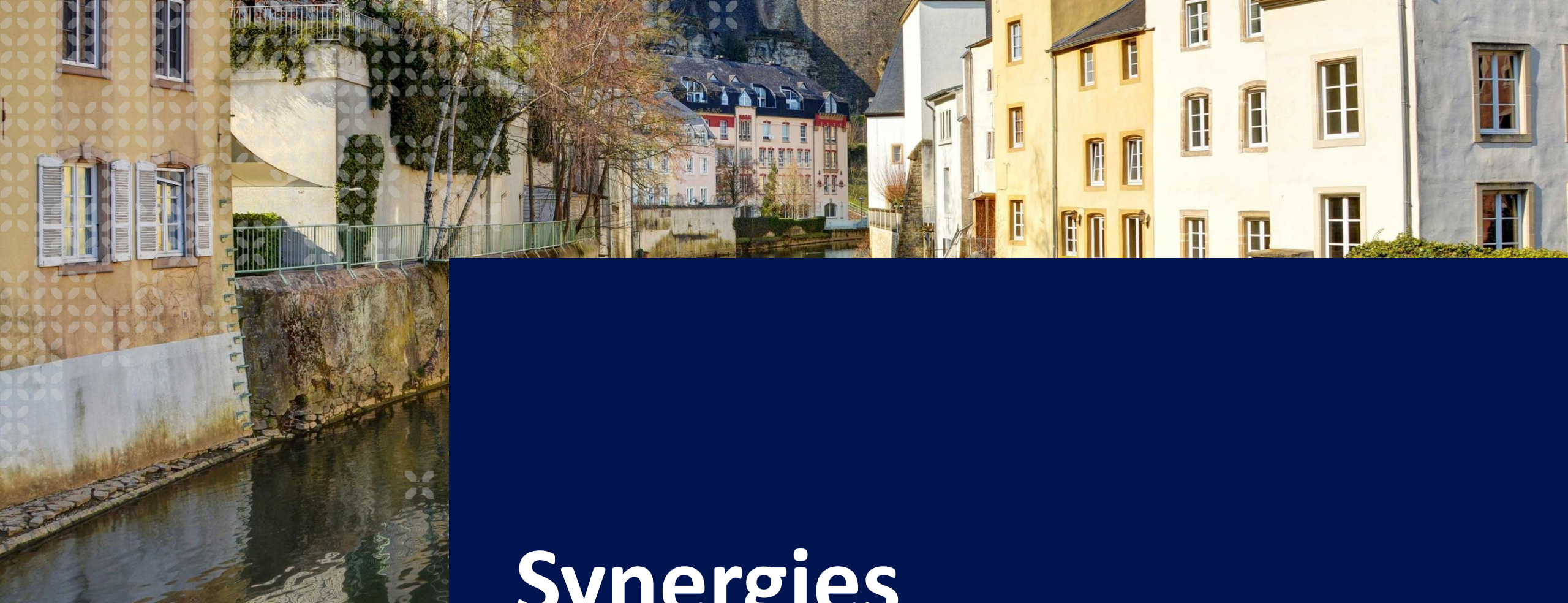
## CSIRT – (CIRCL)

- CIRCL implements a responsible vulnerability disclosure program

# Information exchange under NIS2

## OES – OIS

- notify, without undue delay (early warning within 24 h.) the ILR any incident that has a significant impact on the provision of their services
- Where appropriate, entities concerned shall notify, without undue delay, the recipients of their services



# Synergies

# Synergies

- **The need for effective and efficient collaboration is obvious**, it highlights the necessity of coordination and smart information exchange.
- The CSIRT should **not distort the market**, but enhance it.
- The **collaboration must be as inclusive as possible** (in terms of company size, maturity and roles (technical, managerial)).
- **NIS2 must not lead to more technical and financial discrimination.**

# Synergies

## Synergies generated by HCPN, ILR, LHC

- Organizational security (policies, procedures, best practices) should be created collaboratively and shared by ILR, HCPN and LHC
- Risk management should be facts based (situational awareness), comparable and as objective as possible



## Synergies generated by CSIRT, managed service providers, managed security providers

- The synergetic potential through information exchanged is huge **if** a common taxonomy is adopted, **if** mature entities share extensively, **if** a common cybersecurity data space is used **and** cybersecurity tools, policies and behavior are adapted accordingly
- Situational awareness is understandable by technical teams and management

## Synergies generated by Chambers and federations

- Chambers and federations should consider to open cybersecurity OSPOs as an additional service for their constituency to increase inclusiveness
- Create ISAC (following the example of Fedil IND-ISAC)
- Organize training programs including top management (also in collaboration with the DLH)

# Synergies

## Yet OES and OIS must

- Implement proportionate and necessary security measures, following the guidance they get
- Chose their managed IT and/or cybersecurity services providers wisely
- Connect with ILR, chambers and federations
- Connect with their CSIRT and prepare for incident response. (Mind, that CSIRT will help, but they will neither perform miracles not reconstruct your data or infrastructure)

# Thank you!

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