

NPA 2019-07 "Management of Information Security Risks" Summary of Discussion: AMC & GM

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Summary of AMC & GM Discussions

→ First ESCP Regulatory Processes Work Stream Meeting related to AMC and GM Discussion:

27 & 28 May 2019

- → Based upon a first draft document, covering
 - → General Discussion
 - \rightarrow Implementing Rule
 - → Authority Requirements
 - \rightarrow Organisation Requirements
- → Should be ready early in 2021 to be considered by the European Commission and Member States before adopting the future rule.

European Aviation Sc	afety-Agencyអ	NPA-2019-XXA-(RMT.0720) Proposed-material-for-Part-AISS
		Table-of-contents
	IMPLEMENTING	RULE·(IR)¶
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AMCID Artic	le·1···Objective¶	
AWCIKATIC	le 1Objective	
	— → Article·1·'Objective':¶	
	■ → What-is-the-meaning-of-' potentially-affect-aviation	.information-security-incidents-which-could- -safety':¶
	Guidance-is-needed-to-exp	lain-that-the-effect-on-safety-is-regardless-of-
		direct effect on the aircraft or as an indirect
	effect·by·affecting·the·no Traffic·Management·Netw	ormal·functioning· of· the· European· Aviation· ork·(EATMN).¶
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CALID Anticle		
GWPIR.Article	2·1···Objective¶	
	— → Article·1·'Objective':¶	
	 → What is the meaning of potentially affect aviation 	.information·security·incidents·which·could· ·safety'!¶
	Guidance-is-needed-to-exc	lain-that-the-effect-on-safety-is-regardless-of-
		direct-effect-on-the-aircraft-or-as-an-indirect-
		ormal-functioning- of-the-European-Aviation-
	Traffic-Management-Netw	ork-(EATMN).¶
AMC·IR.Artic	le·2···Scope¶	
{need-guidance-hov	w·coordination·is·taking·place·betwe	en·(CAA)·and·(NSA)}¶
1		
GM·IR.Article	-2Scope	
{need-guidance-hov	w-coordination-is-taking-place-betwe	en-{CAA}-and-{NSA}}¶
COMP.		
1		
1	le-3Definitions¶	
1 AMC·IR.Artic	le-3Definitions¶	
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Development of AMCs and GMs

\rightarrow Objective is to

- → Make use of Industry Standards, where possible
- → Align requirements from both, existing Aviation and IT related Standards and Best Practices, such as (but not limited to):
 - \rightarrow ISO 27000 Series on 'information security management systems (ISMS)' standards;
 - \rightarrow ISO 31000 Series on 'risk management' standards;
 - → CEN EN 16495 on standards for 'Air Traffic Management Information security for organisations supporting civil aviation operations';
 - → ECAC Document 30 'Recommendations on cyber security and supporting Guidance Material'.
 - \rightarrow Eurocae, RTCA or SAE Industry Standards
- → Adopt material available in the Member States for the implementation of the NIS Directive, and for the implementation of ICAO Annex 17, if found appropriate for the wider aviation sector (not just for Essential Services or Aviation Security).



Main Subjects of Discussions held

- \rightarrow Broader Principles to be used
- → Standardisation of Terminology
- → Information Security Management System (ISMS)
- → Audit and Oversight
- → Personnel Requirements (Skills, Background Checks)
- → Logging and Reporting
- → Shared Trans-Organisational Risk Management (STORM)
- → Roles and Responsibilities
- → Sharing of Information

A few more Details (1)

- \rightarrow Broader Principles to be used
 - → Trustworthiness (CEN 16495), Capability Maturity (NPA Example), Operating Conditions (for Information Security, ANC/13 WP-160)
- → Standardisation of Terminology
 - → Alignment of Glossaries between ICAO, ECAC, EASA, Eurocae, SAE-IA, etc.
 - → Adopt what's globally available, and adapt to Aviation, where needed
- → Information Security Management System (ISMS)
 - → ISO27000 "too inward looking", need System-of System notion
 - → Applicability to Supply Chain?
 - → Security Event Management (Incidents, Vulnerabilities, Threats...)
 - → Asset and Config Management

A few more Details (2)

- → Information Security Management System (ISMS) cont'd
 - → Assurance Requirements (see other OT Technical Standards, e.g. IEC62443)
- → Audit and Oversight
 - → One Organisation, One Audit only
 - → Harmonised Audit and Oversight Requirements between Aviation Safety, Security and Essential Services (as far as possible)
 - → Coordination between Competent Authorities
 - → Unified Accreditation of 3rd Party Audit Organisations
 - → Mutual Auditing System



A few more Details (3)

- → Personnel Requirements
 - \rightarrow Skills needed
 - → Who to background check? Based upon which regulation?
- \rightarrow Logging and Reporting
 - → Reporting Objectives? Threshold of reporting?
 - → Raw Data or confirmed safety related? Looking back for how long?
 - → How to avoid duplication with NIS/AVSEC requirements?
 - \rightarrow To whom to report (Authority, ECCSA, EA-ISAC)
 - → Safety reporting (376/2014) sufficient?



A few more Details (4)

- → Shared Trans-Organisational Risk Management (STORM)
 - → Identification of organisational relationships: Functional Chains
 - → Harmonisation of Risk Assessments, which information to share?
 - → Rules for Attribution of Information Security Requirements
 - → How to develop confidence in other organisations
- → Roles and Responsibilities
 - → How to connect organisations?
- → Sharing of Information
 - → Classification of Information or TLP?
 - → Operational Information (ECCSA, ISACs)
 - → Risk Information



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