



Council of the European Union  
General Secretariat

**Brussels, 02 June 2022**

**WK 7987/2022 INIT**

**LIMITE**

**CSC**

**CSCI**

*This is a paper intended for a specific community of recipients. Handling and further distribution are under the sole responsibility of community members.*

## **CONTRIBUTION**

---

From:	General Secretariat of the Council
To:	Security Committee
N° prev. doc.:	WK 7697/22
N° Cion doc.:	7670/22
Subject:	Proposal for a Regulation on information security in the institutions, bodies, offices and agencies of the Union: draft opinion of the Council Security Committee - comments by the Netherlands delegation

---

Delegations will find attached comments by the Netherlands delegation on the draft opinion of the Council Security Committee concerning the proposal for a Regulation on information security in the institutions, bodies, offices and agencies of the Union (WK 7697/22).

**Proposal for a Regulation on information security in the institutions, bodies, offices and agencies of the Union: draft opinion of the Council Security Committee**

**Comments by the Netherlands delegation**

The NL NSA would like to thank the General Secretariat of the Council for its work on the opinion of the CSC regarding the Proposal for a Regulation on information security in the UIBA's (WK 7679/2022). Overall, the draft opinion reflects the discussion held in the previous CSC meetings in the context of this proposal. Nevertheless, the NL NSA would like to propose some changes in the text. In anticipation of the CSC on June 8<sup>th</sup>, the NL NSA hereby shares a new text proposal for paragraph 5 and 7 the opinion

5. In addition, Member States have extensive knowledge and experience in other crucial areas of the protection of EUCI, such as personnel security, TEMPEST approval and industrial security. While the scope of proposal is limited to the EU administration, Member States would be given an advisory role in the proposed security governance through their participation in an information security committee. Further reflection will be, however, needed to understand whether this mechanism sufficiently takes into account Member States' unique position crucial contribution to the protection of EUCI, in line with article 4.2 TFEU.-

7. Finally, the inclusion of non-classified information together with EUCI in the same text may have potential negative consequences, however unintentional, on the protection standards for EUCI. Such provisions could lead to a confusion between the protection rules on sensitive non-classified information and information classified RESTREINT UE/EU RESTRICTED. Further analysis will be needed on the possibility -benefits and disadvantages of having two instruments, one for both for -classified and one for non-classified information.