



The struggle of audit reporting

Matthias Wiedenhorst

ACCREDITATION SCHEMES

- In practical, there is only one accreditation scheme for conformity assessment bodies under the European trust service auditing framework

Accreditation according to ISO/IEC 17065 and ETSI EN 319 403 as conformity assessment body with eIDAS Art. 3 (18) scope of accreditation by the responsible national accreditation body

Name:	TÜV Informationstechnik GmbH
URL to body:	https://www.tuvit.de/en/services/eid-trust-services/
Date of accreditation:	24.06.2016 (until 17.07.2023)
URL to accreditation certificate:	'de' http://www.dakks.de/as/ast/d/D-ZE-12022-01-01.pdf
QTSP/QTS type(s) for which accreditation is granted:	All
Accreditation scheme:	ISO/IEC 17065 + ETSI EN 319 403 + eIDAS Art.3.18 scope of accreditation
URL to eIDAS conformity assessment scheme:	-
URL to CAB's Directory of assessed QTSP/QTS:	https://www.tuvit.de/en/certification-overview-1265-4512.htm

Example from EU list of accredited CABs

<https://ec.europa.eu/futurium/en/content/list-conformity-assessment-bodies-cabs-accredited-against-requirements-eidas-regulation>

AUDITING FRAMEWORK

- Only one set of European Standards applied for auditing of Trust Service Providers

ETSI EN 319 xxx series of European Norms and related / referenced standards

TSPs supporting digital signatures and related services				Replaces	Expected publication			
			Sub-areas					
			Guidance					
TR	1	19	4	0	0	Guidance on the use of standards for TSPs supporting digital signatures and related services	(new)	published
						Policy & Security Requirements		
EN	3	19	4	0	1	General policy requirements for trust service providers	Replacing generic parts of TS 101 456, TS 102 042, (TR 102 040), TS	published
EN	3	19	4	1	1	Policy and security requirements for trust service providers issuing certificates - Part 1: General requirements - Part 2: Requirements for trust service providers issuing EU qualified certificates - Part 3: <i>To be withdrawn</i> - Part 4: Requirements for trust service providers issuing code signing certificates	- TS 102 042 (EV & BR), EN 319 411-3 - TS 101 456 (& TR 102 458), EN 319 411-3 - historical - (new)	- published - published - withdrawn - undefined
EN	3	19	4	2	1	Policy & security requirements for trust service providers issuing time-stamps	TS 102 023	published
EN	3	19	4	3	1	Policy and security requirements for trust service providers providing AdES digital signature generation services	(new)	Undefined
EN	3	19	4	4	1	Policy and security requirements for trust service providers providing AdES digital signature validation services	(new)	Undefined
						Technical Specifications		
EN	3	19	4	1	2	Certificate profiles - Part 1: Overview and common data structures - Part 2: Certificate profile for certificates issued to natural persons - Part 3: Certificate profile for certificates issued to legal persons - Part 4: Certificate profile for web site certificates - Part 5: QCStatements	- (new part) - TS 102 280 & TS 101 862 - (new part) - (new part) - TS 101 862	all parts published
EN	3	19	4	2	2	Time-stamping protocol and time-stamp token profiles	TS 101 861	published
EN	3	19	4	3	2	Protocol profiles for trust service providers providing AdES digital signature generation services	(new)	Undefined
EN	3	19	4	4	2	Protocol profiles for trust service providers providing AdES digital signature validation services	(new)	Undefined

Excerpt from ETSI TR 119 000, V1.2.1 (2016-04)

REPORTING FRAMEWORK

- So there is **one** accreditation scheme and **one** auditing framework
- How many reporting frameworks do we need?

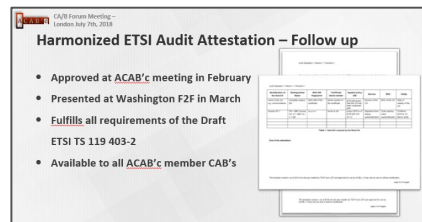
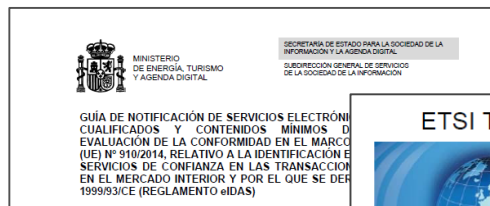


The answer is not **one**...

...at least not today...

REPORTING FRAMEWORK

- ENISA – Guideline „**Conformity assessment of Trust Service Providers** “
- Requirements from Supervisory Bodies
 - Reporting required in national language
 - Special reports regarding national eIDAS implementation laws required
 - Special content requirements
- ETSI TS 119 403-2 V1.1.1 (2018-07)
- ETSI TS 119 403-3
- CAB-Forum requirements
- tbc...



REPORTING FRAMEWORK

- Struggle of audit reporting...
 - for TSPs, because they have to
 - request and maintain different kind of reports for the same service
 - provide to correct report to the different parties
 - for conformity assessment bodies, because they have to
 - maintain a huge variety of reporting templates and template variants
 - identify the correct set of reports for the given use case
 - for supervisory bodies / report consumers, because they have to
 - verify whether or not they received the correct report variant

REPORTING FRAMEWORK

- Who could solve the problem?

- ACAB-c ?

- FESA ?

- European Commission ?

eIDAS Art. 20, 4 (a):

*The Commission may, by means of **implementing acts**, establish reference number of the following standards:*

*(a) accreditation of the conformity assessment bodies and **for the conformity assessment report** referred to in paragraph 1;*

CONCLUSION

- There are too many different report types
- The goal of having only **one** report per trust service might be unrealistic
- Nevertheless all parties should work together and try to minimize variants in order to fulfil the eIDAS goal of European Harmonization

Thank you for your attention!

Your contact person

Matthias Wiedenhorst

Head of Certification Division TSP

IT Infrastructure

+49 201 8999-536

m.wiedenhorst@tuvit.de



TÜV NORD GROUP