

Opinion of the European Cybersecurity Certification Group (ECCG) on the EUCC draft state-of-the-art documents

Adopted on 22 October 2025

The Cybersecurity Act¹ in its Article 62(4), point (e), sets the task for the European Cybersecurity Certification Group (ECCG) to adopt opinions addressed to the Commission relating to the maintenance and review of existing European cybersecurity certifications schemes. Moreover, the European Common Criteria-based cybersecurity certification scheme (EUCC Scheme)² in its articles 48(1) and (2) tasks the ECCG with adopting opinions in view of maintaining the EUCC and undertaking the necessary preparatory works, as well as adopting opinions endorsing state-of-the-art documents.

ENISA, together with the members of the ECCG subgroup on EUCC maintenance and review, has drafted a new state-of-the-art document supporting the EUCC scheme to provide requirements on the application of ADV_SPM.1 in the transition from Common Criteria version 3.1 to Common Criteria version 2022 (CC:2022).

The ECCG calls for the validity of this interpretation of the standard to be time-limited up to 1 October 2026 or until the certification of the relevant Protection Profile (PP) under CC:2022 is available, whichever comes first.

The ECCG also recommends enabling the use of this interpretation for certification processes that already started against Java Card System – Open Configuration (v3.1), BSI-CC-PP-0099-V2-2020.

The ECCG, composed of representatives of Member States, has been consulted and closely involved in developing this draft state-of-the-art document, therefore reflecting the opinion of the group.

The ECCG herewith endorses the following EUCC Scheme draft state-of-the-art document:

- “ADV_SPM.1 interpretation for CC:2022 transition”, version 1.1, October 2025

¹ Regulation (EU) 2019/881 of the European Parliament and of the Council of 17 April 2019 on ENISA (the European Union Agency for Cybersecurity) and on information and communications technology cybersecurity certification and repealing Regulation (EU) No 526/2013 (Cybersecurity Act), OJ L 151, 7.6.2019, p. 15–69.

² Commission Implementing Regulation (EU) 2024/482 laying down rules for the application of Regulation (EU) 2019/881 of the European Parliament and of the Council as regards the adoption of the European Common Criteria-based cybersecurity certification scheme (EUCC), OJ L, 2024/482, 7.2.2024.