



EOS POSITION PAPER on the European Commission

Proposal establishing a Union certification system for aviation security screening equipment

The European Organisation for Security (EOS) represents Europe's leading suppliers of aviation security screening equipment, bringing decades of experience developing security screening and detection technologies for complex new threats through R&D, testing and approval and into the global market. Within EOS, the Security Screening and Detection Technologies Working Group represents leading security screening and detection technology manufacturers with a strong European presence.

EOS TOPLINE MESSAGES

- 1. The current evaluation process provides an effective framework for the testing and approval of new security equipment and subsequent upgrades before deployment.**
- 2. EU certification must not risk impairing Europe's capacity to swiftly develop, adapt or deploy screening technologies that can combat emerging security threats to aviation.**
- 3. A recognised EU certification for aviation security screening equipment, based on the current ECAC evaluation process, can enhance European industry competitiveness on the global market.**

KEY CHALLENGES FOR SUPPLIERS

EOS considers the current proposal (COM/2016/0491 final) to be overly complex and bureaucratic. By adding administrative layers, such as an additional approval authority, and expanding European Commission (EC) competencies concerning testing methodologies, performance standard definition and qualification criteria for test centres beyond current ECAC frameworks, the proposal creates three key challenges:

- 1. Slower evaluation** and approval times of new and adapted security screening equipment, thereby reducing industry's ability to keep up with swiftly evolving threats to the aviation sector, or respond to commercial opportunities.
- 2. Less innovation and fewer new products** will emerge due to increased costs, limiting research and development funding. Additional costs incurred by the addition of complexity and bureaucracy will inevitably lower future investment potential.
- 3. More barriers to entry into the security market** because of the added financial burden of the bureaucracy and complexity borne by the security screening equipment manufacturers.
- 4. Costs and delays for manufacturers that may lead to higher prices for new technology.** This in itself could influence airports and airlines to extend the lifecycle of existing technology providing a barrier to the rollout of new improved technology.

The Regulation must be significantly leaner, with fewer administrative and financial burdens placed on manufacturers if it aims to support Europe's security industry in providing a secure aviation environment, and growing on the global security market.

CONTEXT

The origins of the certification proposal date back as far as 2012, with the publication of the EC's Security Industrial Policy, followed by a public consultation, and impact assessment. At the time, the European Civil Aviation Conference's (ECAC) Common Evaluation Process (CEP) was relatively new, and there was room for improvement in its implementation. Since then, the European Commission has taken the lead in setting detection standards for security equipment and meet regularly with both equipment manufacturers and ECAC. As a result of these meetings the CEP has evolved to better address the needs of the European security environment and the market for security screening equipment. **EOS stresses the significant improvements to the ECAC evaluation process that have been implemented since 2012, and which should be considered ahead of any Regulatory changes.**

EOS SHORT TERM RECOMMENDATIONS

EOS believes that the Regulation should maintain the current ECAC evaluation process for aviation security screening equipment, including the setting of standards and the design, implementation and administration of tests. The only addition to the process would be a recognised EU certification for equipment that successfully passes the ECAC evaluations. This light-touch regulatory change would have several advantages:

- Continued focus on the evolution and improvement of the established ECAC evaluation process in line with the developing EU security environment, thereby avoiding 'reinventing the wheel'.
- Recognised certification standards that are clearly understood by equipment operators, such domestic European airports and cargo forwarders, as well as 3rd country operators.
- A strengthened European security industry, unburdened by additional bureaucracy and costs, empowered to invest in R&D and compete on the global market.

EOS LONGER TERM RECOMMENDATIONS

EOS recommends that regulators encourage increased engagement between manufacturers and ECAC in order to support Europe's security screening equipment industry in the longer term. This could be achieved by creating consultation fora within which manufacturers can express their views at all stages of the evaluation process. Such fora would encourage:

- Significant strengthening of the development-to-market process of security equipment through dialogue early in the process.
- Manufacturers' collaboration, prioritisation and understanding of the CEP process in order to help improve it.
- Technology development roadmaps are in line with emerging threats and testing, and standards are in line with the threat picture.
- Flexibility in the process timelines, particularly with regard to rapidly evolving threats to the aviation sector.

Members of the EOS Working Group on Security Screening and Detection Technologies would welcome the opportunity to provide further clarity on the technical and logistical impacts of the certification proposal on the security of European citizens, and the competitiveness of the European security screening equipment industry on the global market.

The European Organisation for Security (EOS) is the voice of the European security industry and research community. Operating in 15 different countries, EOS Members provide security research, solutions, and services across many security domains, including border, cyber, transport and crisis management. EOS Members represent almost two-thirds of the European security market, including major industry players, SME's, research centres and universities from across the whole business cycle: from technology R&D, equipment manufacturing, and system integration, to service providers, and end-users.