

GIE POSITION PAPER REGARDING THE REVISION AND FUTURE OF THE EUROPEAN PROGRAMME FOR CRITICAL INFRASTRUCTURE PROTECTION (EPCIP)

1. Introduction

Gas Infrastructure Europe (GIE) represents European transmission system operators, storage operators and LNG operators across Europe. As such it is in a unique position to make a positive contribution to Europe's energy needs, and the ongoing security and well being of Europe's citizens. Gas infrastructure transports twice as much energy as the electricity sector, and its strategic importance to Europe is recognized in the 2009 European Program on Critical Infrastructure Protection (EPCIP) Directive. The European Commission is currently in the process of preparing a revision of the EPCIP directive, and this paper marks the start of GIE's positive engagement, and contribution to the successful completion of the recasting process.

2. EPCIP

The EPCIP Directive (European Program on Critical Infrastructure Protection) has been in place since **2009**. Gas infrastructure as a vital part of the Energy sector has been subject to the Directive 2008/114/EC. The intention of the directive is to ensure that European critical infrastructure assets of trans-boundary impact are identified and that assessment of any needs to improve their protection is undertaken by Member states.

EPCIP has been implemented in most EU Member States and has improved some aspects of protection. To realize the ambition of the step change envisaged in EPCIP, costs borne by the gas infrastructure sector for implementing necessary security measures - including operating costs - need to be integrated into Member States tariff arrangements by EU regulation.

3. GIE understanding of critical infrastructure and its protection

GIE's basic philosophy on European Energy Protection:

- We believe in a common and holistic approach on protecting infrastructure of strategic trans-boundary importance in Europe.
- "One level playing field on security on the European level" = Operators share the same goal ("ensure efficient and secure operations at all times all around Europe") without exceptions. This requires openness and equal sharing of information between operators.

Gas infrastructure is subject to European and national legislation and risk assessment to determine its criticality, reflecting its strategic importance. It is important that this potential for duplication is minimized. Measures on security are always dedicated on the situation of the company and/or the Member States. The rationale for a European dimension is that this highly interdependent network has to be seen in its entirety considering the influence of critical single elements that can affect supplies to consumers.

4. Current situation/review on EPCIP from the perspective of the gas infrastructure sector

GIE believes there is some benefit in the European legislation on European Energy Infrastructure Protection. Particularly raising awareness and sharing best practices between infrastructure operators and expanding this practice to National Regulatory Authorities and Member States.

GIE supports the initiative to recast the directive and believes that evolving the existing measures giving more focus on a consistent, qualitative and effective implementation is the right approach going forward.

5. Way forward/ Position on revision

The current Directive 2008/114/EC is seen as an important measure; any future revision of the Directive should lead to a process of improving protection of the infrastructure of European importance in general rather than increasing regulatory and administrative burdens. It is of vital importance to the economic and physical wellbeing of Europe's citizens that European Critical Infrastructure is protected. GIE urges that action is taken when costs are borne by the gas infrastructure sector for implementing necessary security measures. Such costs - including operating costs- need to be taken into account by the competent authorities when approving tariffs in line with EU regulation.

GIE as representative of 35 transmission system operators has a vital contribution to make in the framing of any future proposals or improvements.

GIE urges that the Critical Infrastructure Warning Information Network (CIWIN) should be also available to the gas sector to ensure consistency of information provision and cascade.

GIE believes there is great benefit in continuing and strengthening private-public engagement in general between Commission, Member States and Stakeholders and operators.

A common methodology of risk/threat assessment in Europe for gas infrastructure sector developed by GIE would be desirable. An all hazard approach should be taken.

Information security:

- GIE urges the inclusion of the ICT (Information and Communication Technology) sector in the EPCIP as this may improve the protection of SCADA (System Control and Data Acquisition) Systems.
- GIE proposes to invite ENISA (European Network and Information Security Agency) for contribution in the revision process (for ICT protection).

Contingency planning:

- Member States should be encouraged to support each other in case of emergency concerning the European critical infrastructure.

Costs borne by the gas infrastructure sector for implementing necessary security measures - including operating costs - need to be duly taken into account by competent authorities when approving tariffs, in line with EU regulation.