



**PREMIER
MINISTRE**

*Liberté
Égalité
Fraternité*

**Secrétariat général de la défense
et de la sécurité nationale**

Agence nationale de la sécurité des
systèmes d'information

Paris, le 13 Février 2025

N° 226 /ANSSI/SDE/PSS/CCN

Référence : ANSSI-CC-MAI-P-01_v4.4

PROCEDURE MAINTENANCE

Application : As soon as approved

Circulation : Public

COURTESY TRANSLATION



REVISION HISTORY

Versions	Date	Modifications
1	04/02/2005	Creation
2	16/09/2014	Addition of developments to the product life cycle. Addition of optional ITSEF intervention in the development impact confirmation and maintenance report drafting phase. DCSSI replaced by ANSSI.
3	07/12/2016	Removal of the partial evaluation request based on document ANSSI-CC-CER-F-01, as it duplicates the "Request for Confirmation of Impact" form (ANSSI-CC-MAI-F-01).
4.0	19/06/2017	Inclusion of the customer satisfaction form Added a section regarding maintenance refusal for a major change Inclusion of the new version [CER-P-01]
4.1	04/01/2021	Clarification provided regarding the opinions submitted to the certification steering committee Added a paragraph specifying the conditions for recording and storing documents Inclusion of the change of signatory Inclusion of the new graphic charter
4.2	26/01/2021	Correction of a spelling error
4.3	10/05/2024	Changed the website's SEO and added the possibility of appealing
4.4	13/02/2025	Updated the EUCC requirements (this document only concerns maintenance; other post-certification activities are defined in ANSSI-CC-CER-P-01)

In accordance with the April 18th, 2002 decree No. 2002-535 as amended, the present procedure has been submitted to the Executive Certification Committee, which gave a favourable opinion.

It is planned that this procedure will be submitted to the Executive Certification Committee for comment when major modifications are made.

This procedure is available online at the ANSSI's institutional website (www.cyber.gouv.fr/en).

TABLE OF CONTENTS

1. SUBJECT OF THE PROCEDURE	4
2. DEVELOPMENTS TO CERTIFIED ELEMENTS	4
3. CHANGE IMPACT ANALYSIS.....	4
4. CHANGE(S) IN THE PRODUCT LIFE CYCLE	4
5. REQUEST HANDLING PROCESS	5
5.1. Product development impact confirmation request analysis	5
5.2. Partial evaluation	5
6. MAINTENANCE DECISION.....	5
6.1. For major developments	5
6.2. For minor developments	6
7. APPEAL THE DECISION	6
8. RECORDING AND STORING PERIOD	6
APPENDIX A: REFERENCES.....	7
APPENDIX B: SUMMARY DESCRIPTION OF THE PROCEDURE	8

1. Subject of the procedure

This document describes a procedure for handling upgrades to certified products, called maintenance. This procedure is part of the assurance continuity mechanisms.

This document describes how a maintenance request is made and processed within the national scheme and within the European Common Criteria cybersecurity certification scheme (see [EUCC]).

2. Developments to certified elements

It is probable that developments will be made to the elements (the product itself, its documentation or its development or production environment) to which a certificate relates, hereafter the reference certificate.

If the person who requested the evaluation which led to the reference certificate considers that the impact of the product developments may be classified as minor (see the definition of the term below), they may then ask the certification body to confirm the impact of these developments on the reference certificate using form [MAI-F-01] to kickstart the maintenance procedure.

3. Change impact analysis

The person who requested this confirmation must carry out (or have the product developer carry out) a change impact analysis.

This analysis:

- specifies the product's technical developments and the developments in the supplies used for the reference certificate;
- estimates their impact on the associated evaluation tasks and the security functions evaluated earlier.

The impact is classified as:

- **"major"** if the developments have a potential impact on the evaluation tasks or on the security functions evaluated earlier;
- **"minor"** if the developments have a limited potential impact on the evaluation tasks and on the security functions evaluated earlier;

The conclusions of this analysis must be presented in an "impact analysis report" (IAR), the content of which is indicated in section 5 of the reference procedure [JIL-AC].

NB: This analysis must only be carried out with reference to a certificate issued in the context of [DECREE] and not in relation to the latest version of the product, which might not be certified.

4. Change(s) in the product life cycle

If the developments relate to a change in the life cycle evaluated for the product (for example, the addition of a new production site), the person who requested the evaluation must call on an ITSEF to re-evaluate the ALC assurance components affected. The results of this partial evaluation will be established in a partial Evaluation Technical Report (ETR). For the ALC assurance components

affected, the partial ETR will provide an equivalent level of detail to the level expected in a full evaluation report.

5. Request handling process

For a maintenance request, the person who makes the request must send to ANSSI:

- The impact confirmation request [MAI-F-01]. The annex to this request must be attached when ALC tasks are impacted by changes in the life cycle of the certified product;
- The impact analysis report (IAR);
- The new version of delivery.

The maintenance request will be processed in two main steps:

- An analysis of the product development impact confirmation request;
- A partial evaluation, which will only relate to the ALC tasks, if the life cycle evaluated for the product has changed and the certification body considered that the impact of the technical developments may be considered as minor.

5.1. Product development impact confirmation request analysis

Based on the impact analysis report, the certification body may confirm or reject the nature of the product development impact.

This IAR study may be carried out directly by the certification body. However, the person who makes the request may call on the ITSEF who carried out the reference evaluation for them to provide the certification body with an IAR pre-analysis, based only on the IAR study.

The ITSEF will then only concentrate on the impact analysis to assess the nature of the developments. Under no circumstances will the justification of the nature of the developments require the re-opening of an evaluation task, except for the assurance components affected by an environmental change (ALC components) as specified in section 4.

5.2. Partial evaluation

If the product development impact was considered as minor and a partial evaluation is requested, (see section 4), the certification body will process this case file in the same way as for full evaluations (see [CER-P-01]). However, the validation of the partial ETR drafted by the ITSEF will not lead to issuing a certification report, but to a specific report as described in section 6.2.

6. Maintenance decision

6.1. For major developments

If the certification body considers the changes made to the product to be major, it will issue a maintenance refusal letter to be signed by the Director General of ANSSI.

The sponsor is then invited to have their product re-evaluated. If the sponsor decides to conduct a re-evaluation, the standard certification procedure [CER-P-01] will be applied, and a new, fully completed evaluation request must be sent to the certification body. To assess the costs of this re-

evaluation, the ITSEF will rely on the conclusions of the IAR to reuse as much as possible the results of the work carried out during the evaluation that led to the reference certificate.

6.2. For minor developments

If the certification body confirms that the developments may be classified as minor and, where applicable, has validated the partial evaluation report, the conclusions from the certification center are added to a report named "maintenance report". This report is sent to the Director General of ANSSI for signature. A copy of this report is then sent to the sponsor mentioned in the maintenance request together with a customer satisfaction survey [QUA-F-03].

This report may be published on the ANSSI website if the person who requested the evaluation asks for it and if the reference certificate is published on it. The maintenance report certifies that on the initial product certification date the modified product achieves the same level of resistance as the initial product. It also indicates that the modified product's level of resistance was not analysed in relation to new attacks which have appeared since the reference certificate was published.

7. Appeal the decision

The sponsor may appeal any decision of the certification body to have it reconsidered (see [ANO-P-01]).

8. Recording and storing period

All documents (IAR, ETR if applicable, etc.) used during product maintenance are recorded and stored in accordance with the provisions described in the certification body's quality manual [CCN-MQ].

Appendix A: References

Reference	Document
[DECREE]	Modified decree 2002-535 of April 18th, 2002, related to the security assessment and certification of IT products and systems.
[JIL-AC]	<i>Joint Interpretation Library- Assurance Continuity</i> , current version.
[EUCC]	European cybercertification scheme based on Common Criteria (implementation regulation (UE) 2024/482) and its amendments.
[CCN-MQ]	Quality Manual of the certification center, ANSSI-CC-MQ, current version.
[CER-P-01]	Cybersecurity certification based on the Common Criteria for products and protection profiles, ANSSI-CC-CER-P-01, current version.
[QUA-F-03]	Form: Customer satisfaction survey, ANSSI-CC-QUA-F-03, current version.
[MAI-F-01]	Form: Impact assessment request, ANSSI-CC-MAI-F-01, current version.
[ANO-P-01]	Anomaly handling, ANSSI-CC-ANO-P-01, current version.

Most of these documents can be read and downloaded from the ANSSI's website (www.cyber.gouv.fr/en).

Appendix B: Summary description of the procedure

