IE Domain Registry CLG

trading as .ie

Policy Advisory Committee – PAC #40
Minutes – 11 July 2024 Meeting

Table of Contents

Minutes of the 40th Policy Advisory Committee (PAC) Meeting held on 11 July 2024

Meeting Location: Hybrid meeting: on Microsoft Teams and at .ie Headquarters.

Meeting Time: Called to order at 11:00 am by the PAC Chair.

Members and representatives (non .ie staff) present:

Chair
Association of Patent and Trade Mark Attorneys (APTMA)
CyberSafeKids
Department of Enterprise, Trade and Employment (DETE)
HEAnet
.ie Board Representative
.ie Accredited Registrar (Blacknight)
.ie Accredited Registrar (EuroDNS)
.ie Accredited Registrar (Hosting Ireland)
.ie Accredited Registrar (MarkMonitor)
Irish Reporting & Information Security Service (IRISS)

1. Introduction & Memberships Matters

Apologies – Members not present:

- **Department of Environment, Climate and Communications (DECC)**

- **.ie Accredited Registrar (Namesco)**

Minutes from PAC 39

- The Chair confirmed that the Minutes from PAC 39 were taken as read and published online following the meeting (available at https://www.weare.ie/policy-development-process/).

2. Matters arising

2.1 Policy Proposals: Amendments to the PAC Terms of Reference

- The PAC discussed two proposed amendments to the PAC Terms of Reference:

  - **Amendment 1:** Updating the Eligible Organisations List (The List); and,

  - **Amendment 2:** Updating the Policy Development Process (PDP) Model.

- **Amendment 1:** The PAC Secretariat proposed correcting the out-of-date names on the List, and allowing Ireland's digital regulators – the Commission for Communications Regulation (ComReg), Coimisiún na Meán (CnaM), Data Protection Commission (DPC), and the Competition & Consumer Protection Commission(CCPC) to be eligible for PAC membership.

- The PAC questioned if it was necessary to include ComReg, as they previously have not had an active role in regulating the domain name sector.

- The PAC Secretariat explained that ComReg will likely have a role post-NIS2 and noted that the revised List would be clear that any government body on the PAC would be in an "observer" capacity.

- The PAC supported the proposed amendment with no objections, though some pointed out small errors that should be corrected.

- **Amendment 2:** The PAC Secretariat proposed a new PDP Model that would more accurately capture the policy development process and include a process for minor amendments such as updating information or correcting typos.

- The PAC Secretariat committed to distribute the proposed PDP Model via email list with the Minutes and allow the PAC to provide input by email by PAC 41 (October 2024).

3. Handling of illegality and criminal abuse in the .ie name space

3.1 Netcraft Service Update

- The Registry's Chief Information Officer (CIO) provided an update of statistics from the Netcraft Monitoring Service from January 1 – June 30, 2024.

- It was reported that there were no significant updates or trends in the number of attacks. The number of attacks per month was around **150**, which was close to the average rate. The number of attacks by group per week was consistent with this assessment.

- The CIO noted there was an increase in "Recovery Scams," in which victims of malware/ransomware are targeted by a second set of scammers posing as law enforcement.

- The representative from IRISS also noted that there was also a large database of breached passwords recently published online, and a new trending attack in which compromised company's websites are re-directed to explicit websites before a is ransom demanded.

3.2 Discussion on the *Internet Watch Foundation*

- The PAC Secretariat provided a recap from PAC 39 in which the PAC supported .ie taking part in the *Internet Watch Foundation's* Real-Time Alert service and TLD Hopping List service but stated that .ie needed clear policies & procedures.

- The PAC Secretariat reported that .ie would develop its own internal policies & processes but led a discussion on the broad principles that could guide those policies.

- **Real-Time Alert Process:** The PAC Secretariat reviewed an example from the Public Interest Registry on how they handle Real-Time Alerts from the IWF.

- The PAC Secretariat proposed that the process .ie creates should reflect the following principles: **(i)** Registrars and authorities had to be immediately notified **(ii)** there should be a time frame for Registrars and Registrants to address the issue **(iii)** suspending a domain name should only be a last resort; and, **(iv)** appeals should be allowed for suspended domain names.

- The PAC agreed that these elements should be reflected in .ie's internal processes.

- **TLD Hopping List**: The PAC Secretariat explained that .ie had internal processes for high-risk domain names. One process is **blocking** – which makes a domain name permanently unusable. An alternative process is **reserving** – in which a domain name is prevented from being registered normally, but an applicant can still apply for that domain name through an [application process](#) that the PAC approved in 2020.

- The PAC Secretariat proposed that "reserving" the domain names was the more proportionate method to mitigate risk as it was not a permanent solution, and allowed for appeals through a PAC-approved process.

- The PAC agreed that *reserving* a domain name instead of permanently *blocking* was a "proportionate" and "reasonable" approach.

4. NIS2 – Directive on Security of Network & Information Systems (NIS2)

5.1 NIS2 Tracker and Roadmap

- The PAC Secretariat reported that NIS2 transposition was due in 3 months, and provided an update on activities since PAC 39 that had taken place:

  - The NIS2 Working Group met on 9 July 2024 to discuss draft Implementing Acts that were released from the European Commission

  - .ie had taken part in multiple conferences where NIS2 was discussed

  - .ie had ongoing discussions with the National Cyber Security Centre (NCSC) and the Data Protection Commission (DPC) on questions about Article 28 of NIS2

  - .ie participated in a study from the European Union Agency for Cyber Security (ENISA) on Article 28

  - A Registrar Webinar on the NIST 2.0 Framework was scheduled for 16 July 2024; and,

  - .ie had launched a new Accreditation Framework to promote and reward best practices for Registrars.

5.2 Key Emerging Updates

- The PAC Secretariat also reported the following key updates:

  - To date there have been no Heads of Bill for the *National Cyber Security Bill.*

  - The NCSC announced at the conference that NIS2 compliance will be closely related to the NIST 2.0 CyberSecurity Framework.

  - The NCSC also announced the creation of an online portal for companies to have to self-report as an essential or important entity to the NCSC.

5.3 NIS2 Working Group

- The PAC Secretariat reported on the last meeting of the NIS2 Working Group:

  - The draft NIS2 Implementing Acts were discussed. There was concern over ambiguous definitions in the draft Act.

  - The Working Group also discussed a voluntary GDPR code of conduct for registrars to map Article 28 NIS2 requirements to the Article 5 Principles of GDPR. The Working Group agreed in principle with this approach.

- The Working Group recommended that .ie increase its awareness building activities for Registrars on NIS2 through tools like the Registrar newsletters.

5. Any Other Business & Next Meetings

- The PAC Secretariat gave a brief announcement that work was underway to plan an Ireland Internet Governance Forum for next year.

- Conflicts for the next two PAC meetings (10 October and 12 December) were identified with industry events and conferences.

- The next two PAC meetings will now be held on the following dates:

  - **31 October 2024**

  - **05 December 2024**