

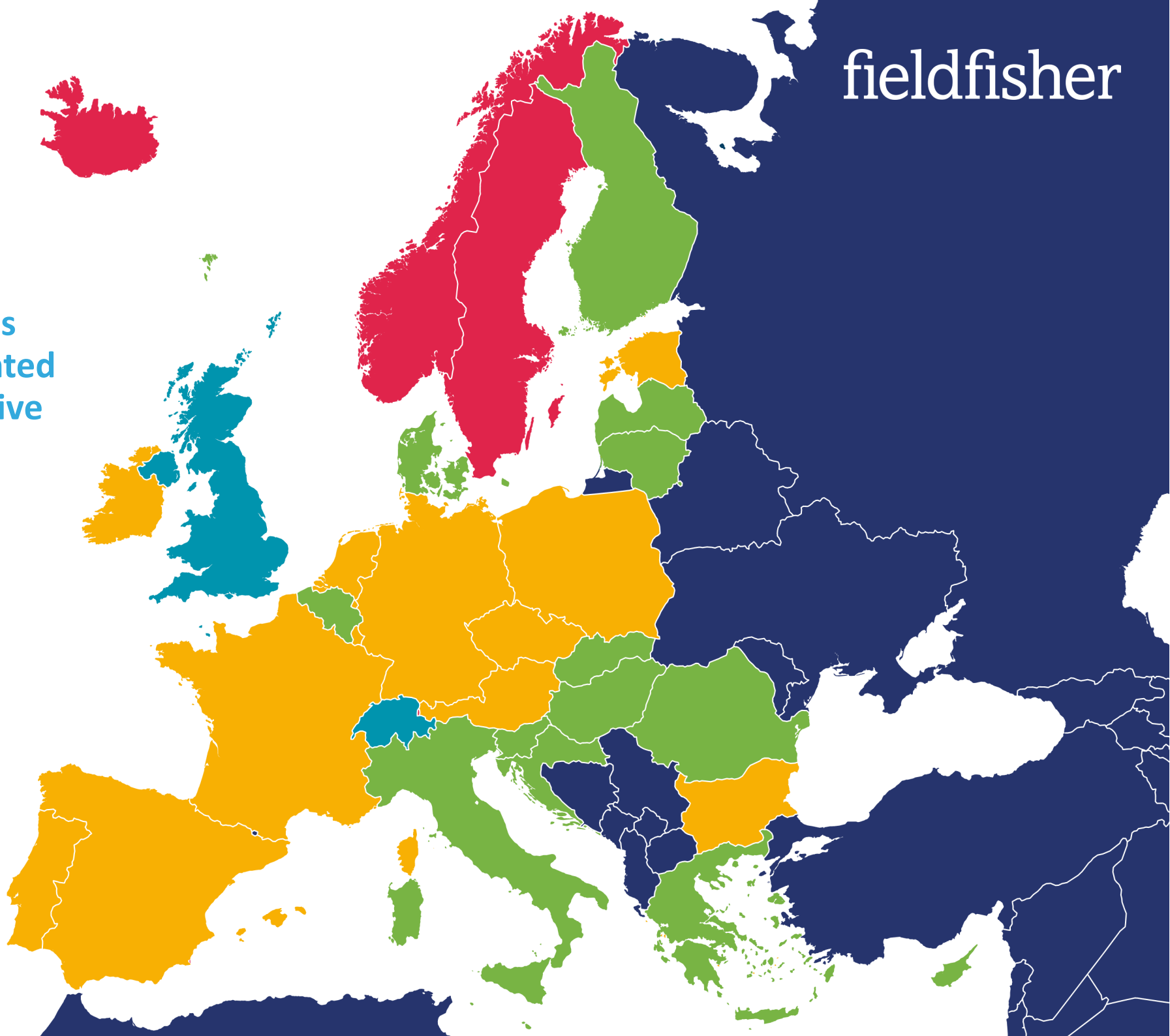
NIS2 across the EU

Which countries
have implemented
the NIS2 Directive
into local law?

- Implemented
- Draft Published
- No Draft
- Similar regime in force or planned

Accurate as at 30 May 2025

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NIS2 across the EU

Under NIS2, Member States must have notified ENISA by **17 January 2025** of the in-scope entities providing certain digital services in their territory.

This is a key deadline in the Member States that have already transposed their law, as they have required various digital services providers to register prior to this deadline.

We have been assisting clients with registration across the EU. **Contact us if you have not yet registered and our team can support you to register quickly, in compliance with local requirements.**

The deadline for transposition set in the directive expired on **17 October 2024**. The EU Commission has initiated **infringement proceedings** against a number of EU Member States, in response to the continuing delay in implementing the NIS2 Directive.

This includes:

- the countries that had not yet implemented NIS2 in time; and
- the countries whose local laws may not fully comply with NIS2 (e.g. Latvia and Hungary).

Key changes: Among other features, NIS2:

- significantly widens the scope of entities and sectors that will be regulated for cyber security;
- imposes much more prescriptive requirements on cyber security risk-management compared to other legislation like the GDPR; and
- sets out new enforcement measures which could have significant impacts on management bodies.

Current implementation status:

In collaboration with our relationship firms across the EU, our market-leading European Cybersecurity team is delighted to have produced this NIS2 status update. Many states have missed the 17 October 2024 deadline to implement the Directive into local law, with several not even expecting to be ready until Q2 or Q3 of 2025.

Also, it currently looks like the EEA countries of Norway, Iceland and Liechtenstein will implement NIS2 although this may still take several years.

What next? Businesses operating or providing services in the EU need to assess if they are in scope of NIS2, what they

need to do to comply and where they will need to register. These are not simple questions and different thresholds and tests apply to determine what local laws are relevant.

This is particularly important for digital service providers who may be able to benefit from the Article 26 main establishment principle, potentially simplifying their compliance requirements.

How to get in touch. If you would like to receive updates on new developments or would like to speak with our cybersecurity legal experts, please contact Julia Spurrett:

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17 October
2024



Fieldfisher Cybersecurity Team

Our multidisciplinary Cyber team works across the Fieldfisher network, advising on all issues around cyber-security and defence. We focus on areas as diverse as policies, cyber readiness and training, regulatory compliance, breach containment, insurance, mergers and acquisitions, litigation and regulatory outreach and defence.



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We are particularly well versed in the range of new digital regulation coming into force across the UK and EU, including the Digital Operational Resilience Act (DORA), NIS2, the AI Act and other regimes focused on telecoms security and connected devices.



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We have a pan-European network of offices and relationship firms with whom we are collaborating to bring you this status update and help with client queries in each Member State. Please see below for our key contacts on NIS2 in each Member State.



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Country status and key contacts

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<div>The main NIS2 Act and the NIS2 Act for the telecommunications sector were adopted on 29 April 2025 and will enter into force on 1 July 2025, following the earlier implementation of NIS2 for digital infrastructure ICT service management in the financial sector.</div>							
<div><div>Bulgaria</div><div>Draft</div><div>Published</div><div><div></div></div></div>	<div><div><div><div></div><div></div><div></div></div><div>LAWYERS</div></div></div>	<div><div>Mariya Papazova</div><div>m.papazova@ppglawyers.eu</div></div>	<div><div>Irena Georgieva</div><div>i.georgieva@ppglawyers.eu</div></div>	<div><div>Estonia</div><div>Draft</div><div>Published</div><div><div></div></div></div>	<div><div>Ellex[®]</div><div>Raidla</div></div>	<div><div>Ants Nomper</div><div>ants.nomper@ellex.legal</div></div>	<div><div>Merlin Liis-Toomela</div><div>merlin.liis-toomela@ellex.legal</div></div>
<div><div>Croatia</div><div>Implemented</div><div><div></div></div></div>	<div><div>karanovic/partners</div></div>	<div><div>Boris Dvorščak</div><div>boris.dvorscak@ilej-partners.com</div></div>	<div><div>A new piece of implementing regulation was enacted on 30 November, to address more of the Directive's requirements such as criteria for reporting incidents and risk management measures.</div></div>				
<div><div>Finland</div><div>Implemented</div><div><div></div></div></div>			<div><div>HH PARTNERS</div><div>ATTORNEYS-AT-LAW</div></div>	<div><div>Martin von Willebrand</div><div>martin.vonwillebrand@hhpartners.fi</div></div>	<div><div>Anna-Sofia Toivettula</div><div>anna-sofia.toivettula@hhpartners.fi</div></div>		
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<div>The NIS2 Directive's implementing legislation was published in Cyprus on 25 April 2025, marking its official date of entry into force.</div>							

Country status and key contacts

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On 8 April 2025, Malta transposed NIS2 into national law, but the date of its entry into force has not yet been confirmed.

Italy

Implemented



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The new Information Security Act (ZInfV-1) will enter into force on 19 June 2025.							
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Portugal Draft Published 	 <small>COELHO RIBEIRO E ASSOCIADOS SOCIIDADE CIVIL DE ADVOGADOS</small>	Mónica Oliveira Costa monica.costa@cralaw.com	Jaime Medeiros jaime.medeiros@cralaw.com	Sweden No Draft 	 <small>ADVOKATFIRMAN</small>	Martin Gynnerstedt martin.gynnerstedt@fylgia.se	
The Portuguese Council of Ministers have approved the final version of the NIS2 implementing Bill and the Bill has been sent to the Portuguese Parliament for approval.							
Romania Implemented 	 <small>Legal & Tax</small>	Iurie Cojocar iurie.cojocar@nndkp.ro	Oana Stefan oana.stefan@nndkp.ro	Switzerland Similar regime in force or planned 		Clara-Ann Gordon clara-ann.gordon@nkf.ch	
*Switzerland is subject to a separate bi-lateral trade agreement with the EU and has been pursuing its own reforms with various similar features to NIS2. A new requirement for operators of critical infrastructure to report cyber attacks within 24 hours of discovery became effective on 1 April 2025.							
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*On 1 April 2025, the UK government announced further details on the proposed Cyber Security and Resilience Bill which will update the UK's existing NIS Regulations in several key areas.							