

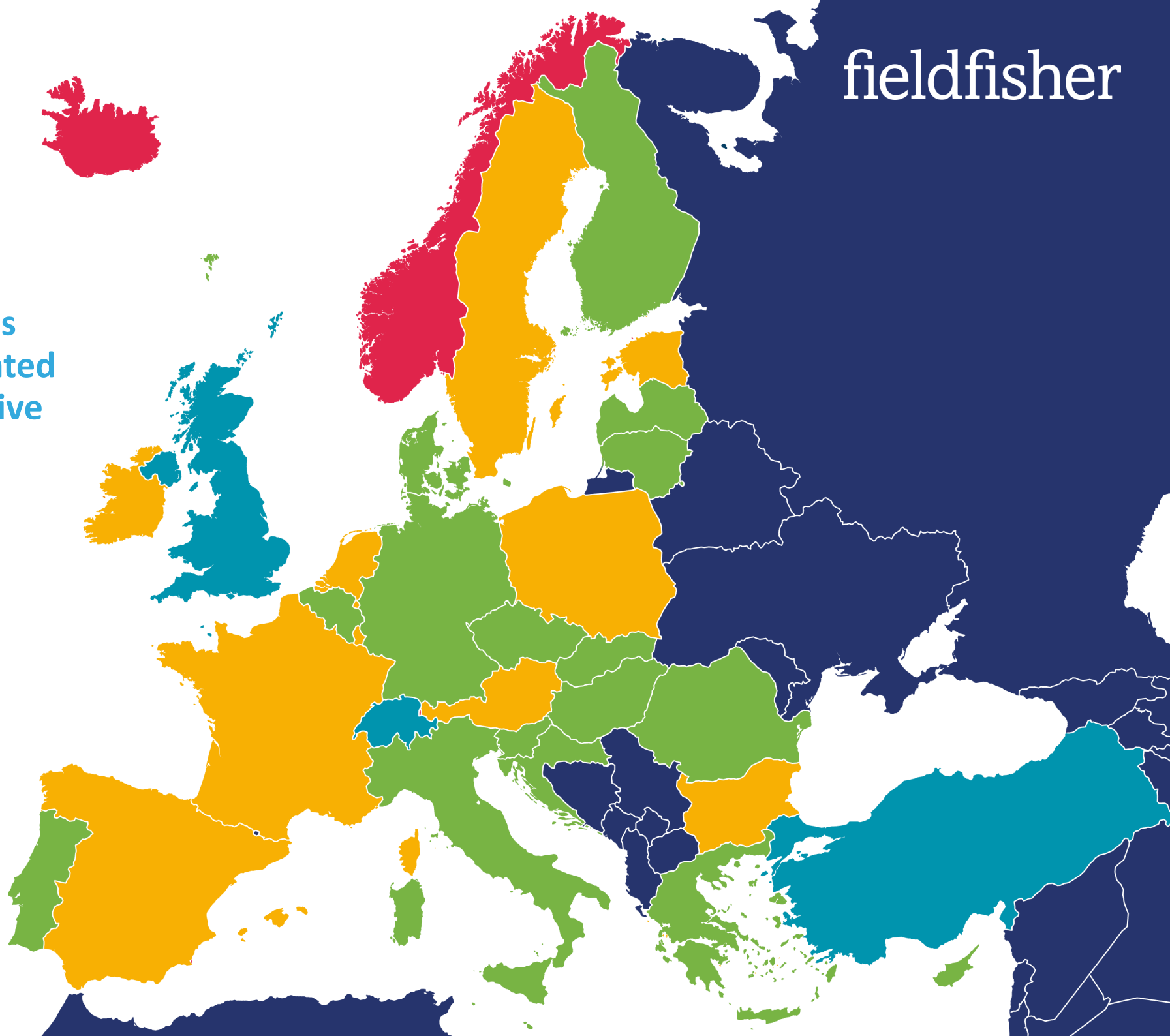
NIS2 across the EU

Which countries
have implemented
the NIS2 Directive
into local law?

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

Accurate as at 06 December 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><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>Mariya Papazova</div><div>m.papazova@ppglawyers.eu</div></div> <div><div>Irena Georgieva</div><div>i.georgieva@ppglawyers.eu</div></div>	<div><div><div><div></div><div></div><div></div></div><div>LAWYERS</div></div><div>Mariya Papazova</div><div>m.papazova@ppglawyers.eu</div></div>
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<div><div>Cyprus</div><div>Implemented</div><div><div></div></div></div> <div><div><div><div></div><div></div></div><div>ELIAS NEOCLEOUS & Co LLC</div></div><div>Demetris Gregoriou</div><div>demetris.gregoriou@neo.law</div></div> <div><div>Andrea Kallis</div><div>andrea.kallis@neo.law</div></div>	<div><div><div><div></div><div></div></div><div>ELIAS NEOCLEOUS & Co LLC</div></div><div>Demetris Gregoriou</div><div>demetris.gregoriou@neo.law</div></div>
<div><div>Czech Republic</div><div>Implemented</div><div><div></div></div></div> <div><div><div><div></div><div></div></div><div>HAVEL & PARTNERS</div><div>CONNECTED THROUGH SUCCESS</div></div><div>Robert Nešpůrek</div><div>robert.nespurek@havelpartners.cz</div></div> <div><div>Dalibor Kovář</div><div>dalibor.kovar@havelpartners.cz</div></div> <div><div>The new Czech Cybersecurity Act, which transposes the NIS2 Directive, will enter into force on 1 November 2025. Entities subject to mandatory registration must notify the National Cyber and Information Security Agency within 60 days of this date, by 31 December 2025</div></div>	<div><div><div><div></div><div></div></div><div>HAVEL & PARTNERS</div><div>CONNECTED THROUGH SUCCESS</div></div><div>Robert Nešpůrek</div><div>robert.nespurek@havelpartners.cz</div></div>
<div><div>Denmark</div><div>Implemented</div><div><div></div></div></div> <div><div><div><div></div><div></div></div><div>PLESNER</div></div><div>Bodil Hald</div><div>bmh@plesner.com</div></div> <div><div>Niels Christian Ellegaard</div><div>nce@plesner.com</div></div> <div><div>The main NIS2 Act and the NIS2 Act for the telecommunications sector were adopted on 29 April 2025 and will entered 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><div><div><div></div><div></div></div><div>PLESNER</div></div><div>Bodil Hald</div><div>bmh@plesner.com</div></div>
<div><div>Estonia</div><div>Draft</div><div>Published</div><div><div></div></div></div> <div><div><div><div></div><div></div></div><div>Ellex[®] Raidla</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>The draft law is currently in Parliament. And has passed the first reading. The second and third readings are due to take place in December 2025.</div></div>	<div><div><div><div></div><div></div></div><div>Ellex[®] Raidla</div></div><div>Ants Nomper</div><div>ants.nomper@ellex.legal</div></div>
<div><div>Finland</div><div>Implemented</div><div><div></div></div></div> <div><div><div><div></div><div></div></div><div>HH PARTNERS</div><div>ATTORNEYS-AT-LAW</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> <div><div>A new law has been proposed to amend the Finnish Act on Electronic Communication Services.</div><div>Changes to the Finnish Cybersecurity Act will come into effect on 01 January 2026, including amendments concerning specific supervisory authorities and an amendment concerning the enforcement of administrative fines.</div></div>	<div><div><div><div></div><div></div></div><div>HH PARTNERS</div><div>ATTORNEYS-AT-LAW</div></div><div>Martin von Willebrand</div><div>martin.vonwillebrand@hhpartners.fi</div></div>
<div><div>France</div><div>Draft</div><div>Published</div><div><div></div></div></div> <div><div>fieldfisher</div><div>Marguerite Brac de La Perrière</div><div>marguerite.bracdelaperriere@fieldfisher.com</div></div>	<div><div>fieldfisher</div><div>Marguerite Brac de La Perrière</div><div>marguerite.bracdelaperriere@fieldfisher.com</div></div>

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Implemented

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The German NIS-2 Implementing Act (NIS2UmsuCG) was published in the federal Gazette on 05 December 2025 and the Act came into force on 06 December 2025.

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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.

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Country status and key contacts

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<p>*Norway has adopted the Digital Security Act to implement the NIS1 Directive, with the Act scheduled to enter into force on 1 October 2025.</p>			
Poland Draft Published 	 Laszczuk Agnieszka Zwierzyńska agnieszka.zwierzynska@laszczuk.pl Prof. Justyna Kurek-Sobieraj justyna.kurek@laszczuk.pl	Sweden Draft Published 	 FYL GIA Martin Gynnerstedt martin.gynnerstedt@fylgia.se A draft law (Sw. Proposition) was published on 9 October 2025 and the new Cyber Security Act is proposed to enter into force on 15 January 2026. A decision on the draft law is expected in December 2025.
<p>The Polish draft law implementing NIS2 was approved by the Council of Ministers in October 2025 and forwarded for further legislative work – i.e., to Parliament. The regulations are anticipated to be adopted by the end of 2025.</p>			
Portugal Implemented 	 CRA COELHO RIBEIRO E ASSOCIADOS SOCIEDADE CIVIL DE ADVOGADOS Mónica Oliveira Costa monica.costa@cralaw.com Jaime Medeiros jaime.medeiros@cralaw.com	Switzerland Similar regime in force or planned 	 NKF 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; penalties for reporting violations apply from 1 October 2025.
<p>The NIS2 Directive was transposed into law by Decree-Law 125/2025 on 04 December 2025.</p>			
Romania Implemented 	 NNDKP Legal & Tax Iurie Cojocar iurie.cojocar@nndkp.ro Oana Stefan oana.stefan@nndkp.ro	Türkiye Similar regime in force or planned 	BTS&PARTNERS Melis Mert Yasin Beceni melis.mert@bts-legal.com yasin.beceni@bts-legal.com Türkiye's new Cyber Security Law, in force since 19 March 2025, establishes a national framework for protecting digital infrastructure and regulating cyber operations. It imposes compliance obligations on public and private entities, including incident reporting, inspections, and oversight of cyber-sector M&A. Secondary legislation will refine these duties, with partial alignment to the EU's NIS2 Directive expected.
<p>A draft DNSC Order approving the implementing rules and the risk-based methodology for prioritising supervision, verification, and control activities has been published.</p>			
Slovakia Implemented 	 HAVEL & PARTNERS CONNECTED THROUGH SUCCESS Štěpán Štarha stepan.starha@havelpartners.sk Adam Klizan adam.klizan@havelpartners.sk	UK Similar regime in force or planned 	fieldfisher James Walsh Michael Butterworth james.walsh@fieldfisher.com michael.butterworth@fieldfisher.com 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.
<p>The new Information Security Act (ZInfV-1) entered into force on 19 June 2025.</p>			
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