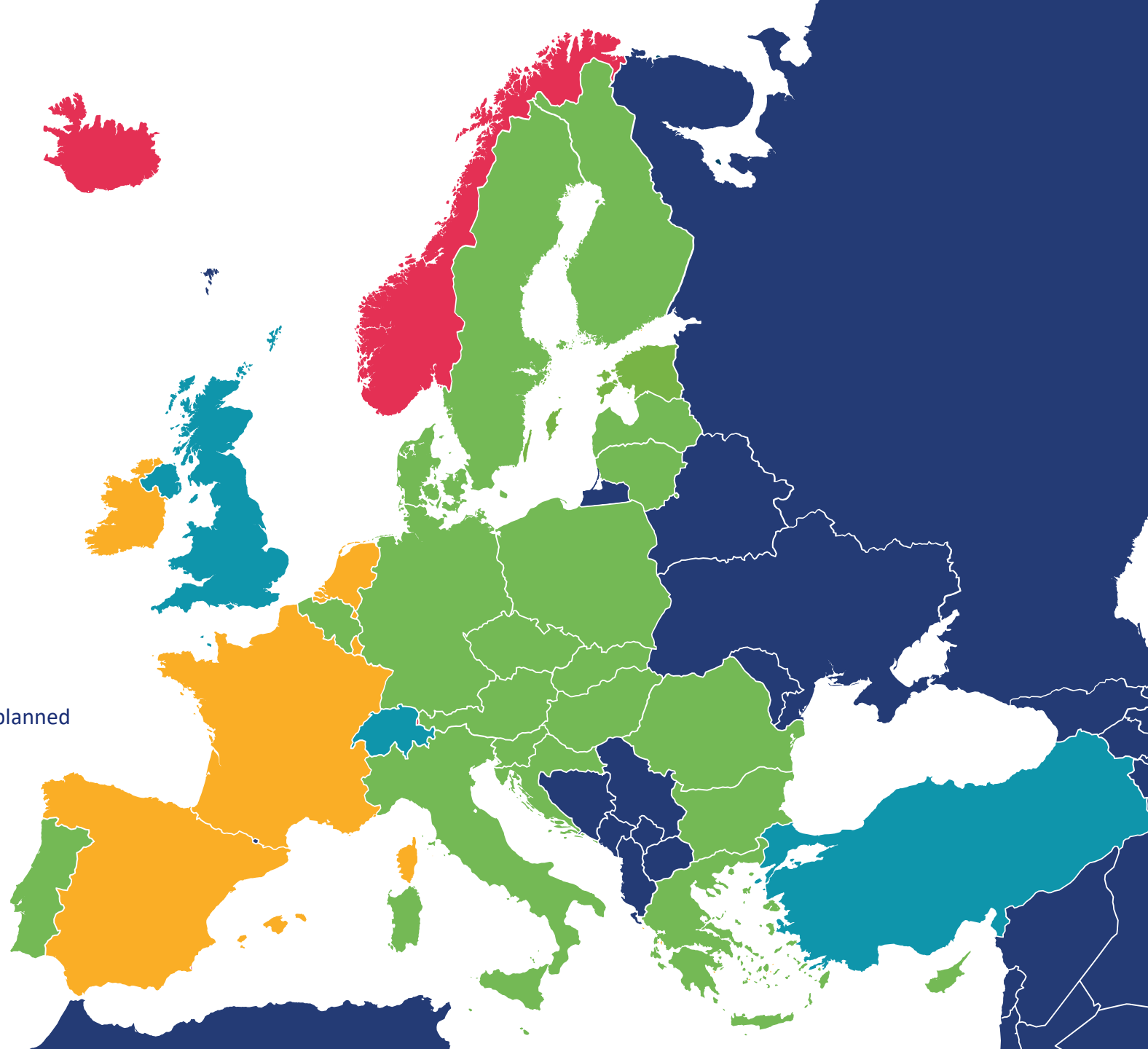


NIS2 across the EU

Which countries have implemented the NIS2 Directive into local law?

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



NIS 2 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:** julia.spurrett@fieldfisher.com



Fieldfisher Cybersecurity Team

Our multidisciplinary Cyber team works across the Fieldfisher network, advising on all issues around cybersecurity 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.

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.

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.



James Walsh
Partner, Technology, London

+44 (0) 330 460 7083
james.walsh@fieldfisher.com



Kirsten Whitfield
Partner, Data, London

+44 (0) 330 460 7058
kirsten.whitfield@fieldfisher.com



Michael Butterworth
Director, Data, London

+44 (0) 330 460 6122
michael.butterworth@fieldfisher.com



Country status and key contacts

Austria
Implemented

fieldfisher

Philipp Reinisch
philipp.reinisch@fieldfisher.com



Not yet in force: NISG 2026, the implementing act, was published on 23 December 2025. It will enter into force on 01 October 2026.

Belgium
Implemented

fieldfisher

Tim Van Canneyt
tim.vancanneyt@fieldfisher.com

Olivier Proust
olivier.proust@fieldfisher.com



Bulgaria
Implemented



Mariya Papazova
m.papazova@ppglawyers.eu

Irena Georgieva
i.georgieva@ppglawyers.eu



Croatia
Implemented

karanovic/partners

Boris Dvorščak
boris.dvorscak@ilej-partners.com



Cyprus
Implemented



Demetris Gregoriou
demetris.gregoriou@neo.law

Andrea Kallis
andrea.kallis@neo.law



Czech Republic
Implemented



Robert Nešpůrek
robert.nespurek@havelpartners.cz

Dalibor Kovář
dalibor.kovar@havelpartners.cz



Denmark
Implemented

PLESNER

Bodil Hald
bmh@plesner.com

Niels Christian Ellegaard
nce@plesner.com



Estonia
Implemented



Ants Nomper
ants.nomper@ellex.legal

Merlin Liis-Toomela
merlin.liis-toomela@ellex.legal



Finland
Implemented



Martin von Willebrand
martin.vonwillebrand@hhpartners.fi

Anna-Sofia Toivettula
anna-sofia.toivettula@hhpartners.fi



France
Draft
Published

fieldfisher

Anne-Laure-Hélène des Ylouses
alhdesylouses@fieldfisher.com



The bill on the resilience of critical infrastructure and the strengthening of cybersecurity, which transposes the European NIS2 directives into French law, has still not been adopted. The planned date is July 2026.

Country status and key contacts

Germany
Implemented

fieldfisher

Martin Lose
martin.lose@fieldfisher.com

Thorsten Ihler
thorsten.ihler@fieldfisher.com



Greece
Implemented

NIKOLINAKOS
& PARTNERS LAW FIRM | TECH

Dr Nikos Th. Nikolinakos
nikolinakos@nllaw.gr

Dina Kouvelou
kouvelou@nllaw.gr



Hungary
Implemented

provaris
VARGA & PARTNERS

Zsombor Orbán
orban.zsombor@provaris.hu

Claudia Bagoly
Bagoly.claudia@provaris.hu



Ireland
Draft
Published

fieldfisher

Leonie Power
leonie.power@fieldfisher.com



Italy
Implemented

fieldfisher

Diego Rigatti
diego.rigatti@fieldfisher.com

Paola la Notte
paola.lanotte@fieldfisher.com



Latvia
Implemented

Ellex[®]
Klavins

Sarmis Spilbergs
sarmis.spilbergs@ellex.legal

Mikijis Zimecs
mikijis.zimecs@ellex.legal



Lithuania
Implemented

Ellex[®]
Valiunas

Jaunius Gumbis
jaunius.gumbis@ellex.legal

Tomas Kamblevicius
tomas.kamblevicius@ellex.legal



Luxembourg
Draft
Published

fieldfisher

Ingrid Dubourdieu
ingrid.dubourdieu@fieldfisher.com

Errol Briones
errol.briones@fieldfisher.com



Malta
Implemented

GVZH
ADVOCATES

Andrew Zammit
andrew.zammit@gvzh.mt

Nick Scerri
nick.scerri@gvzh.mt



Netherlands
Draft
Published

fieldfisher

Ady van Nieuwenhuizen
ady.vannieuwenhuizen@fieldfisher.com

Merel van Aar
merel.vanaar@fieldfisher.com



The House of Representatives has adopted the draft legislation for NIS2 implementation. In parallel, the government is working on the underlying secondary legislation. The government continues to aim for simultaneous entry into force of NIS2 and the related secondary legislation in Q2 2026.

Country status and key contacts

Norway
No Draft

Selmer

Stale Hagen
s.hagen@selmer.no

Jennifer Parmlind
j.parmlind@selmer.no



Norway has adopted the Digital Security Act to implement the NIS1 Directive, with the Act entered into force on 1 October 2025.

Poland
Implemented

fieldfisher

Marcin Huczkowski
Marcin.Huczkowski@fieldfisher.com

Bartosz Jussak
Bartosz.Jussak@fieldfisher.com



The NIS 2 legislation entered into force on 3 April 2026.

Portugal
Implemented

CRA
COELHO RIBEIRO E ASSOCIADOS
SOCIEDADE CIVIL DE AVOCADOS

Mónica Oliveira Costa
monica.costa@cralaw.com

Jaime Medeiros
jaime.medeiros@cralaw.com



Romania
Implemented

NNDKP
Legal & Tax

Iurie Cojocar
iurie.cojocar@nndkp.ro

Oana Stefan
oana.stefan@nndkp.ro

On 5 January 2026, the DNSC published two draft orders which are currently in the public consultation phase for the following: (1) the approval of the Cybersecurity Risk Management Measures for the networks and information systems used by essential and important entities and of the Methodology for the self-assessment of the maturity of the measures, and for the amendment of the Methodology of 11 August 2025 on assessing the risk level of entities; and (2) the approval of the training standard for members of the management bodies of essential and important entities and of the list of cybersecurity certifications.



Slovakia
Implemented

HAVEL & PARTNERS
CONNECTED THROUGH SUCCESS

Štěpán Štarha
stepan.starha@havelpartners.sk

Adam Klizan
adam.klizan@havelpartners.sk



Slovenia
Implemented

karanovic/partners

Kevin Rihtar
kevin.rihtar@karanovicpartners.com



Spain
Draft
Published

fieldfisher

Carlos Pérez
carlos.perez@fieldfisher.es



Sweden
Implemented

ADVOKATFIRMAN
FYLGIA

Martin Gynnerstedt
martin.gynnerstedt@fylgia.se



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.

Türkiye
Similar regime
in force or
planned

BTS&PARTNERS

Melis Mert
melis.mert@bts-legal.com

Yasin Beceni
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.

UK
Similar regime
in force or
planned

fieldfisher

James Walsh
james.walsh@fieldfisher.com

Michael Butterworth
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.