



NIS-2 for Research and Education

recent developments and observations

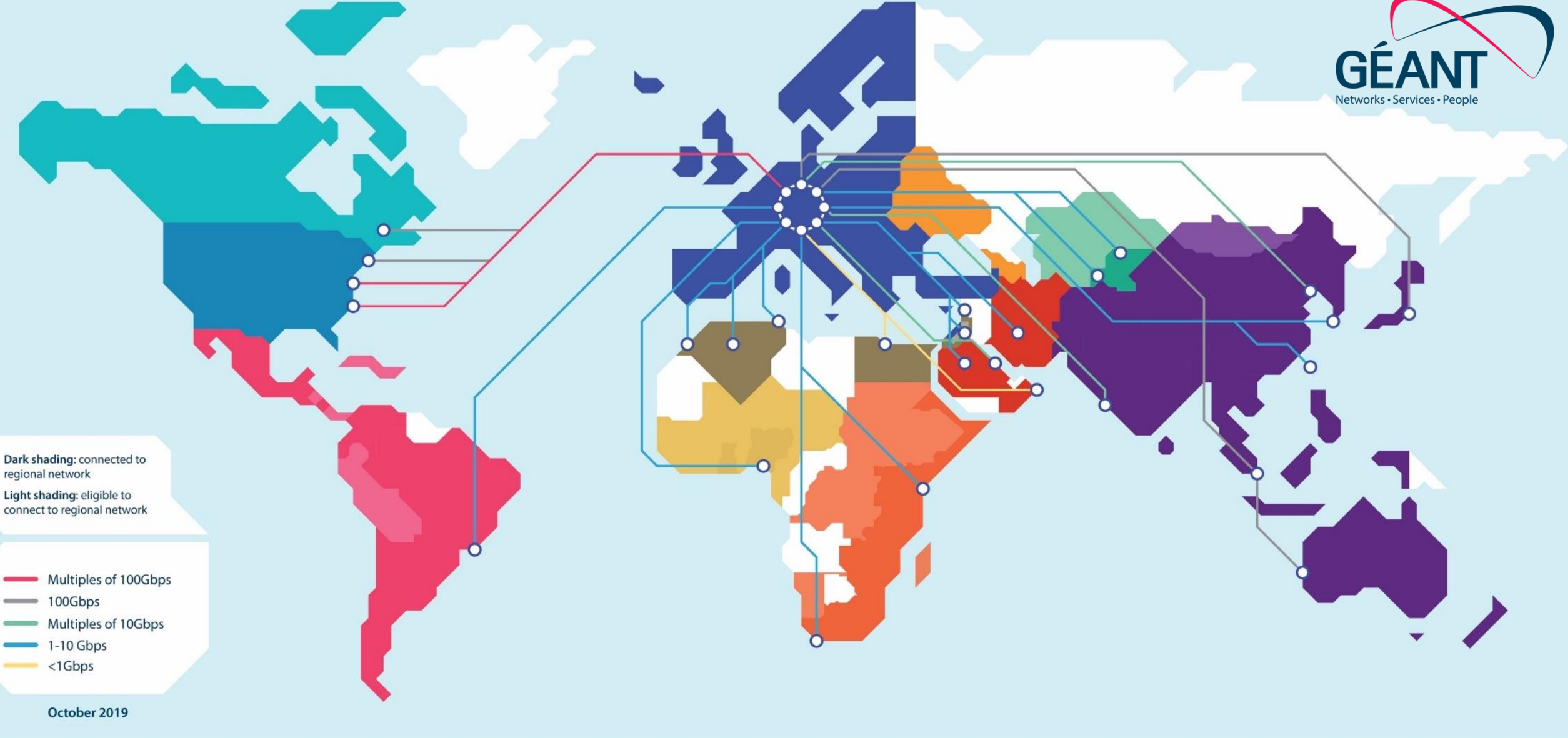
Alf Moens, GÉANT Cybersecurity lead

June 2025

Public

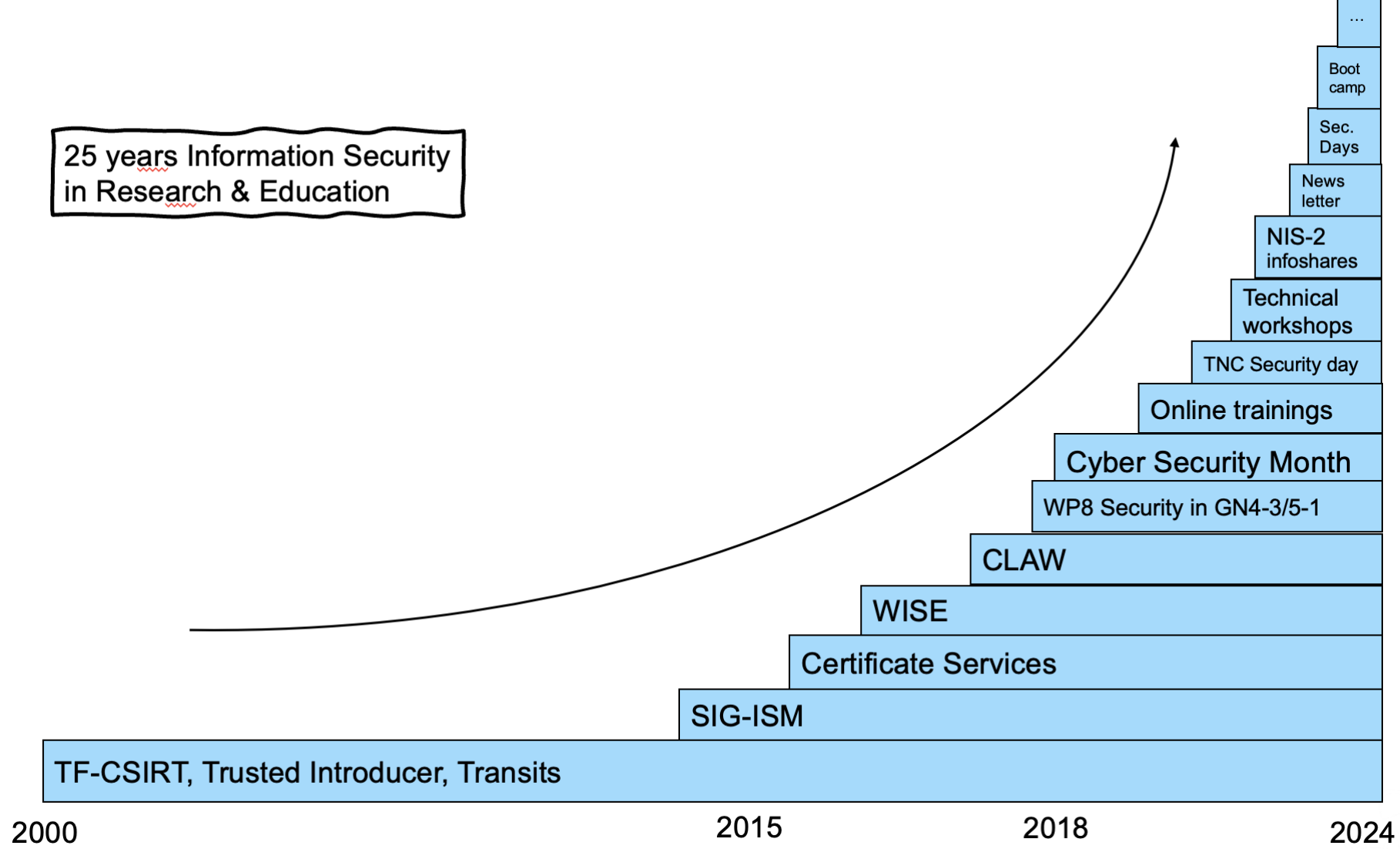
-  Fibre
-  Spectrum
-  Connected Regional Network
-  Leased Capacity





Security @ GÉANT

25 years Information Security
in Research & Education



What is NIS-2?

Security Management

CSIRT cooperation

For whom?

Duty of Care

Where are we now?

What does it mean?

Duty to Report

National implemen-
tations

Rulings

For
GEANT

For you

Incidents

Vulnera-
bilities

What is next?

Quick Recap, how it started

- NIS-2 is to improve the resilience of services that are critical for day-to-day life in the European Union
- A large part of the directive is for Nation States themselves
- NIS-2 directive has been published on 15th of December 2022, and will be in action within 21 months from the "entry in force":
- **4th of October 2024:** (January 4th 2023+ 21 months) latest, but with the Council Recommendation **to do it ASAP. (only 3 member states met this deadline)**
- Standards are still 'negotiated' via comitology (delegated Act)
 - Expect „Rulings” or „guidance” from ENISA and NIS Cooperation Group
- Obligations are „logical”, no real surprises



Table 1: Overview of EU Legislations in the Digital Sector

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Research & Innovation	Industrial Policy	Connectivity	Data & Privacy	IPR	Cybersecurity	Law Enforcement	Trust & Safety	E-commerce & Consumer Protection	Competition	Media	Finance
Digital Europe Programme Regulation. (EU) 2021/694	Recovery and Resilience Facility Regulation. (EU) 2021/241	Frequency Bands Directive. (EC) 1987/372	ePrivacy Directive. (EC) 2002/58, 2017/0003(COD)	Database Directive. (EC) 1996/9	Regulation for a Cybersecurity Act. (EU) 2019/881, 2023/0108(COD)	Law Enforcement Directive. (EU) 2016/680	Product Liability Directive (PLD). (EC) 1985/374, 2022/0302(COD)	Unfair Contract Terms Directive (UCTD). (EEC) 1993/13	EC Merger regulation. (EC) 2004/139	Satellite and Cable Directive. (EEC) 1993/83	Common VAT system. (EC) 2006/112, 2022/0407(CNS)
Horizon Europe Regulation. (EU) 2021/695, (EU) 2021/764	InvestEU Programme Regulation. (EU) 2021/523	Radio Spectrum Decision. (EC) 2002/676	European Statistics. (EC) 2009/223, 2023/0237(COD)	Community Design Directive. (EC) 2002/6, 2022/0391(COD)	Regulation to establish a European Cybersecurity Competence Centre. (EU) 2021/887	Directive on combating fraud and counterfeiting of non-cash means of payment. (EU) 2019/713	Toys Regulation. (EC) 2009/48, 2023/0230(COD)	Price Indication Directive. (EC) 1998/6	Technology Transfer Block Exemption. (EU) 2014/4316	Information Society Directive. (EC) 2001/29	Administrative cooperation in the field of taxation. (EU) 2011/16
Regulation on a pilot regime for distributed ledger technology. (EU) 2022/858	Connecting Europe Facility Regulation. (EU) 2021/1153	Open Internet Access Regulation. (EU) 2015/2120	General Data Protection Regulation (GDPR). (EU) 2016/679	Enforcement Directive (IPRL). (EC) 2004/48	NIS 2 Directive. (EU) 2022/2555	Regulation on interoperability between EU information systems in the field of borders and visa. (EU) 2019/817	European Standardization Regulation. (EU) 2012/1025	E-commerce Directive. (EC) 2000/31	Company Law Directive. (EU) 2017/1132, 2023/0089(COD)	Audio-visual Media Services Directive (AVMSD). (EU) 2010/13	Payment Service Directive 2 (PSD2). (EU) 2015/2366, 2023/0203(COD)
	Regulation on High Performance Computing Joint Undertaking. (EU) 2021/1173, 2024/0016(CNS)	European Electronic Communications Code Directive (EECC). (EU) 2018/1972	Regulation to protect personal data processed by EU institutions, bodies, offices and agencies. (EU) 2018/1725	Directive on the protection of trade secrets. (EU) 2016/943	Cybersecurity Regulation. (EU) 2023/2841	Regulation on terrorist content online. (EU) 2021/784	Radio Equipment Directive (RED). (EU) 2014/53	Unfair Commercial Practices Directive (UCPD). (EC) 2005/29	Market Surveillance Regulation. (EU) 2019/1020	Portability Regulation. (EU) 2017/1128	Digital Operational Resilience Act (DORA Regulation). (EU) 2022/2554
	Regulation on Joint Undertakings under Horizon Europe. (EU) 2021/2085, 2022/0033(INLE)	eu top-level domain Regulation. (EU) 2019/517	Regulation on the free flow of non-personal data. (EU) 2018/1807	Design Directive. 2022/0392(COD)	Information Security Regulation. 2022/0084(COD)	Temporary CSAM Regulation. (EU) 2021/1232, 2022/0135(COD)	eIDAS Regulation (European Digital Identity Framework). (EU) 2014/910	Directive on Consumer Rights (CRD). (EU) 2011/83	P2B Regulation. (EU) 2019/1150	Satellite and Cable II Directive. (EU) 2019/788	Crypto-assets Regulation (MiCA). (EU) 2023/1114
	Decision on a path to the Digital Decade. (EU) 2022/2481	Roaming Regulation. (EU) 2022/612	Open Data Directive (PSI). (EU) 2019/1024	Compulsory licensing of patents. 2023/0129(COD)	Cyber Resilience Act. 2022/0272(COD)	E-evidence Regulation. (EU) 2023/1543	Regulation for a Single Digital Gateway. (EU) 2018/1724	e-invoicing Directive. (EU) 2014/55	Single Market Programme. (EU) 2021/690	Copyright Directive. (EU) 2019/790	Financial Data Access Regulation. 2023/0205(COD)
	European Chips Act (Regulation). (EU) 2023/1781	Union Secure Connectivity Programme. (EU) 2023/588	Data Governance Act (DGA Regulation). (EU) 2022/868	Standard essential patents. 2023/0133(COD)	Cyber Solidarity Act (Regulation). 2023/0109(COD)	Digitalisation of cross-border judicial cooperation. (EU) 2023/2944	General Product Safety Regulation. (EU) 2023/988	Regulation on cooperation for the enforcement of consumer protection laws. (EU) 2017/2394	Vertical Block Exemption Regulation (VBER). (EU) 2022/720	European Media Freedom Act. (EU) 2024/1063	Payment Services Regulation. 2023/0210(COD)
	Establishing the Strategic Technologies for Europe Platform (STEP). (EU) 2024/795	Gigabit infrastructure Act. (EU) 2024/1309	European Data Act (Regulation). (EU) 2023/2854			Directive on combating violence against women. 2022/0066(COD)	Machinery Regulation. (EU) 2023/1230	Geo-Blocking Regulation. (EU) 2018/302	Digital Market Act (DMA Regulation). (EU) 2022/1925	Remuneration of musicians from third countries for recorded music played in the EU	Digital euro. 2023/0212(COD)
	European critical raw materials act (Regulation). (EU) 2024/1252	New radio spectrum policy programme (RSPP 2.0)	Interoperable Europe Act. (EU) 2024/303			Directive for combating sexual abuse and child sexual abuse material. 2024/0035(COD)	AI Act (Regulation). 2021/0106(COD)	Digital content Directive. (EU) 2019/770	Regulation on distortive foreign subsidies. (EU) 2022/2560		Regulation on combating late payment. 2023/0323(COD)
	Net Zero Industry Act. 2023/0081(COD)	Digital Networks Act	Regulation on data collection for short-term rental. (EU) 2024/1028			Digitalization of travel documents	Eco-design Regulation. 2022/0095(COD)	Directive on certain aspects concerning contracts for the sale of goods. (EU) 2019/771	Horizontal Block Exemption Regulations (HBER). (EU) 2023/1066, (EU) 2023/1067		
	EU Space Law		European Health Data Space (Regulation). 2022/0140(COD)				AI Liability Directive. 2022/0303(COD)	Digital Services Act (DSA Regulation). (EU) 2022/2065	Platform Work Directive. 2021/0414(COD)		
			Harmonisation of GDPR enforcement procedures. 2023/0202(COD)					Political Advertising Regulation. (EU) 2024/900	Single Market Emergency Instrument (SMEI). 2022/0278(COD)		
			Access to vehicle data, functions and resources					Right to repair Directive. 2023/0083(COD)			
			GreenData4all					Consumer protection, strengthened enforcement, cooperation			

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			GreenData4all					Consumer protection, strengthened enforcement, cooperation			

Cybersecurity

Regulation for a Cybersecurity Act, (EU) 2019/881, 2023/0108(COD)

Regulation to establish a European Cybersecurity Competence Centre, (EU) 2021/887

NIS 2 Directive, (EU) 2022/2555

Cybersecurity Regulation, (EU) 2023/2841

Information Security Regulation, 2022/0084(COD)

Cyber Resilience Act, 2022/0272(COD)

Cyber Solidarity Act (Regulation)

Table 2: Overview of EU governance Mechanisms and Agencies in the Digital sector

Explanation

- 1 EU Institution
- 2 Decentralised agency
- 3 Executive agency
- 4 Governing board
- 5 Independent body
- 6 Advisory body
- 7 Network of Member States
- 8 European Standardisation Organisations

Research & Innovation	Industrial Policy	Connectivity	Data & Privacy	IPR	Cybersecurity	Law Enforcement	Trust & Safety	E-Commerce & Consumer Protection	Competition	Media	Finance
1 European Commission (DG CNCT): Unit D.1 [EU] 2021/694, [EU] 2021/695	4 Governing Board of European High-Performance Computing Joint Undertaking (EuroHPC-JU) [EU] 2021/1173	1 European Commission (DG DEFIS): Unit B.1 [EU] 2023/588	2 European Health and Digital Executive Agency (HADEA), [EU] 2021/1173	3 European Union Intellectual Property Office (EUIPO) [EU] 2012/596, [EU] 2017/1001	1 CERT-EU [EU, EURATOM] 2023/2841	3 European Anti-Fraud Office (OLAF) [EC] 1999/352	1 European Commission (DG CNCT): AI Office [2021/0106(COD)]	1 European Commission (DG JUST): Unit B.3 (Consumer Enforcement and Redress)	1 European Commission (DG CNCT): Unit F.2 & F.3 [EU] 2022/1925, [EU] 2022/2065	6 European Board for Media Services [EU] 2024/1083	1 European Central Bank (ECB) [EU] 2015/2366, 2023/0212 (COD)
2 European Research Council Executive Agency (ERCEA) [EU] 2021/173, [EU] 2021/694, [EU] 2021/695	4 Governing Board of Chips Joint Undertaking (Chips JU) [2022/0033(INLE)]	3 Body of European Regulators for Electronic Communications (BEREC) [EU] 2015/2120, [EU] 2018/1972, [EU] 2022/612	4 European Data Protection Board (EDPB) [EU] 2016/679	5 European Patent Organization (EPO) [EU] 2012/1257	2 European Cybersecurity Competence Centre (ECCC) [EU] 2021/887	3 EU Fundamental Rights Agency (FRA) [EC] 2007/168	4 Gateway coordination group [EU] 2018/1724	6 European Board for Digital Services [EU] 2022/2065	1 European Commission [DG COMP: Antitrust]		3 European Securities and Markets Authority (ESMA) [EU] 2022/858, [EU] 2022/2554, [EU] 2023/1114
2 European Innovation Council & SMEs Executive Agency (EISMEA) [EU] 2021/173, [EU] 2021/694, [EU] 2021/695	4 European Digital Infrastructure Consortium (EDIC) [EU] 2022/2481	3 European Union Agency for the Space Programme (EUSPA) [EU] 2021/696, [EU] 2023/588	4 European Data Protection Supervisor (EDPS) [EU] 2018/1725	6 European Observatory on Infringements of IPR [EU] 2012/386	3 European Defence Agency (EDA) [ICESP] 2015/1835	3 Europol [EU] 2016/794	6 European Artificial Intelligence Board [2021/0106(COD)]	7 Consumer Protection Cooperation Network (CPC) [EU] 2017/2394	1 European Commission [DG GROW]: Unit A.4 [2022/0278 (COD)]		5 European Banking Authority (EBA) [EU] 2015/2366, [EU] 2022/2554, [EU] 2023/1114, 2023/0205 (COD)
2 European Research Executive Agency (REA) [EU] 2021/173, [EU] 2021/694, [EU] 2021/695	4 European Chips Infrastructure Consortium (ECIC) [EU] 2023/1781	4 Governing Board of Smart Networks and Services Joint Undertaking (SNS JU) [EU] 2021/2085	5 European Statistical System Committee [EC] 2009/223	6 Compulsory licences advisory body [2023/0129(COD)]	3 EU Agency for Cybersecurity (ENISA) [EU] 2019/881	3 European Public Prosecutor's Office (EPPO) [EU] 2017/1939	4 European Committee for Electrotechnical Standardization (CENELEC) [EU] 2012/1025	7 European Consumer Centres Network [EU] 2021/690	6 Advisory Committee on Restrictive Practices and Dominant Positions [EC] 2003/1		5 European Insurance and Occupational Pensions Authority (EIOPA) [EU] 2022/2554, 2023/0205 (COD)
4 European Institute of Innovation & Technology (ETI) [EU] 2021/173, [EU] 2021/694, [EU] 2021/695	6 European Semiconductor Board [EU] 2023/1781	5 European Space Agency (ESA) [EU] 2023/588	6 European Data Innovation Board (EDIB) [EU] 2022/868, [EU] 2023/2854		4 European Cyber Shield [2023/0109(COD)]	3 eu-LISA [EU] 2018/817, [EU] 2018/1726	8 European Committee for Standardization (CEN) [EU] 2012/1025	7 Consumer Safety Network [EU] 2023/988	6 Advisory Committee on Concentrations [EC] 2004/139		6 Committee on Administrative Cooperation for Taxation [EU] 2011/161
7 European Digital Innovation Hubs Network (EDIH) [EU] 2021/694	6 European Critical Raw Materials Board [EU] 2024/1252	6 Communications Committee (COCOM) [EU] 2018/1972, [EU] 2019/517, [EU] 2022/612	6 Interoperable Europe Board [EU] 2024/903		6 European Cybersecurity Certification Group (ECG) [EU] 2019/881	3 Eurojust [EU] 2018/1727	8 European Telecommunications Standards Institute (ETSI) [EU] 2012/1025		6 Contact Committee [EU] 2017/1132		6 VAT Committee [EC] 2008/112, [CNS] 2022/0407
	6 Net-Zero Europe Board [2023/0081 (COD)]	6 .eu Multistakeholder Advisory Group [EU] 2019/517	5 European Health Data Space Board (EHDS) [2022/0140(COD)]		6 Interinstitutional Cybersecurity Board (ICB) [EU, Euratom] 2023/2841	3 Frontex [EU] 2019/1896			6 High-Level Group on DMA [EU] 2022/1925		6 The Standing Committee on Administrative Cooperation [CNS] 2022/0407
	7 European network of competence centers in semiconductors [EU] 2023/1781	6 Interoperable Europe Board [EU] 2024/903			6 NIS cooperation group [EU] 2022/2555	6 Interoperability Advisory Group [EU] 2019/817			7 European Competition Network (ECN) [EC] 2003/1		
					6 Interinstitutional Information Security Coordination group [2022/0084(COD)]	7 European Judicial Network in criminal matters [2022/0086 (COD)]			7 Union Product Compliance Network [EU] 2019/1020		
					7 Network of National Coordination Centres [EU] 2021/887						
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					7 EU CyOLoNe [EU] 2022/2555						

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4 European Institute of Innovation & Technology (ETI) [(EU) 2021/173, (EU) 2021/694, (EU) 2021/695]	6 European Semiconductor Board [(EU) 2023/1781]	5 European Space Agency (ESA) [(EU) 2023/588]	6 European Data Innovation Board (EDIB) [(EU) 2022/868, (EU) 2023/2854]		4 European Cyber Shield [(2023/0109(COD)]	3 eu-LISA [(EU) 2018/817, (EU) 2018/1726]	8 European Committee for Standardization (CEN) [(EU) 2012/1025]	7 Consumer Safety Network [(EU) 2023/988]	6 Advisory Committee on Concentrations [(EC) 2004/139]		6 Committee on Administrative Cooperation for Taxation [(EU) 2011/16]
7 European Digital Innovation Hubs Network (EDIH) [(EU) 2021/694]	6 European Critical Raw Materials Board [(EU) 2024/1252]	6 Communications Committee (COCOM) [(EU) 2018/1972, (EU) 2019/517, (EU) 2022/612]	6 Interoperable Europe Board [(EU) 2024/903]		6 European Cybersecurity Certification Group (ECCG) [(EU) 2019/881]	3 Eurojust [(EU) 2018/1727]	8 European Telecommunications Standards Institute (ETSI) [(EU) 2012/1025]		6 Contact Committee [(EU) 2017/1132]		6 VAT Committee [(EC) 2006/112, (CNS) 2022/0407]
	6 Net-Zero Europe Board [(2023/0081(COD)]	6 .eu Multistakeholder Advisory Group [(EU) 2019/517]	5 European Health Data Space Board (EHDS) [(2022/0140(COD)]		6 Interinstitutional Cybersecurity Board (ICB) [(EU, Euratom) 2023/2841]	3 Frontex [(EU) 2019/1896]			6 High-Level Group on DMA [(EU) 2022/1925]		6 The Standing Committee on Administrative Cooperation [(CNS) 2022/0407]
	7 European network of competence centers in semiconductors [(EU) 2023/1781]	6 Interoperable Europe Board [(EU) 2024/903]			6 NIS cooperation group [(EU) 2022/2555]	6 Interoperability Advisory Group [(EU) 2019/817]			7 European Competition Network (ECN) [(EC) 2003/1]		
					6 Interinstitutional Information Security Coordination group [(2022/0084(COD)]	7 European Judicial Network in criminal matters [(2022/0086(COD)]			7 Union Product Compliance Network [(EU) 2019/1020]		
					7 Network of National Coordination Centres [(EU) 2021/887]						
					7 CSIRTs network [(EU) 2022/2555]						
					7 EU CyCLONe [(EU) 2022/2555]						

Cybersecurity

1

CERT-EU [(EU, Euratom) 2023/2841]

2

European Cybersecurity Competence Centre (ECCC) [(EU) 2021/887]

3

European Defence Agency (EDA) [(CFSP) 2015/1835]

3

EU Agency for Cybersecurity (ENISA) [(EU) 2019/881]

4

European Cyber Shield [(2023/0109(COD)]

[(2023/0109(COD)]

6

European Cybersecurity Certification Group (ECCG) [(EU) 2019/881]

6

Interinstitutional Cybersecurity Board (IICB) [(EU, Euratom) 2023/2841]

6

NIS cooperation group [(EU) 2022/2555]

6

Interinstitutional Information Security Coordination group [(2022/0084(COD)]

7

Network of National Coordination Centres [(EU) 2021/887]

7

CSIRTs network [(EU) 2022/2555]

7

EU CyCLONe [(EU) 2022/2555]

In or out of scope?

Critical Infrastructure?
In scope of NIS1?

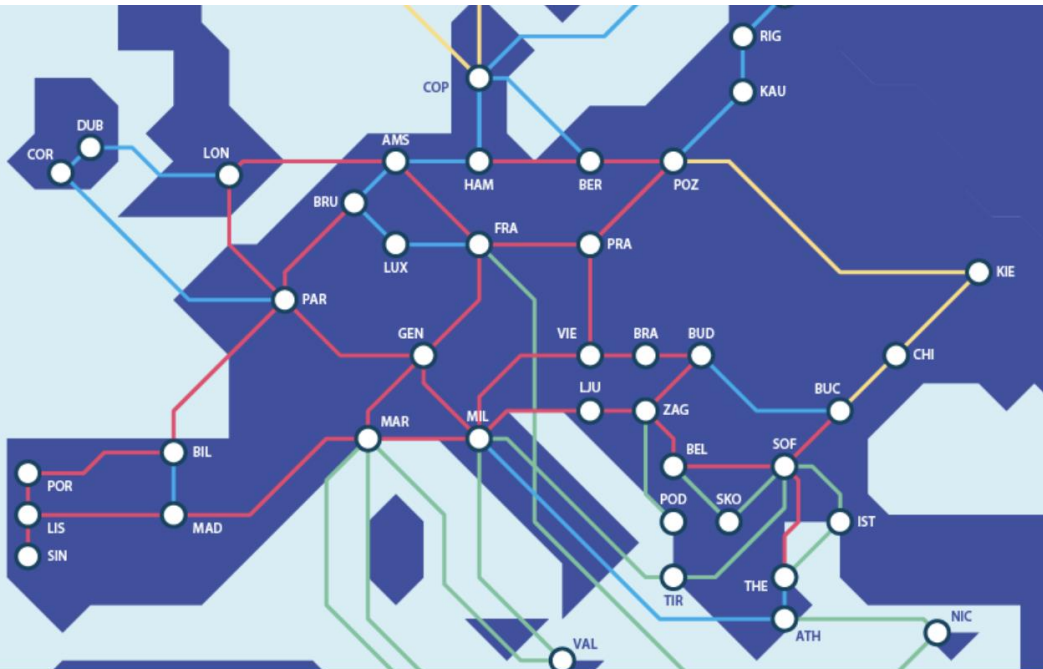
Gouvernement Agency?

Public Digital Infrastructure?

.tld? Internet exchange?

Education??

Supply chain dependencies?



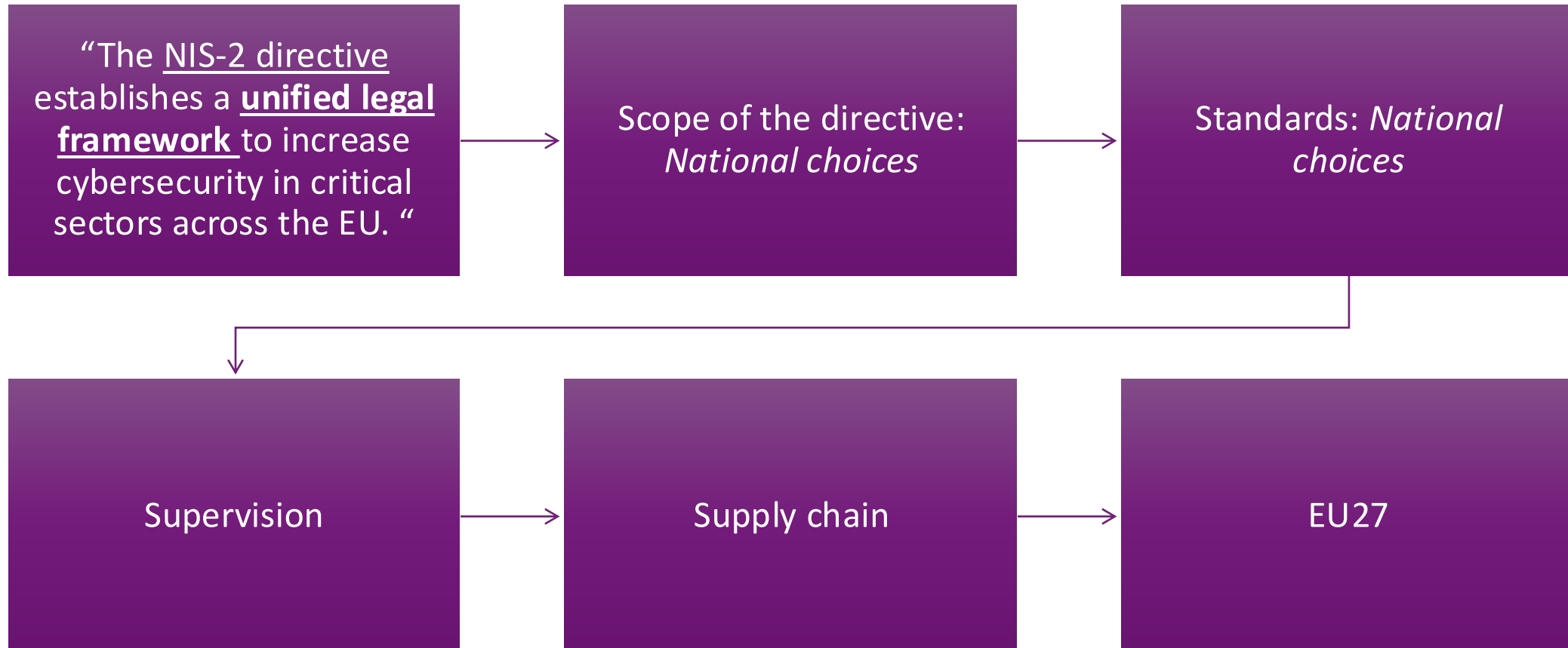
What you need to do



duty of care
duty to report
Information sharing

Where are we now?

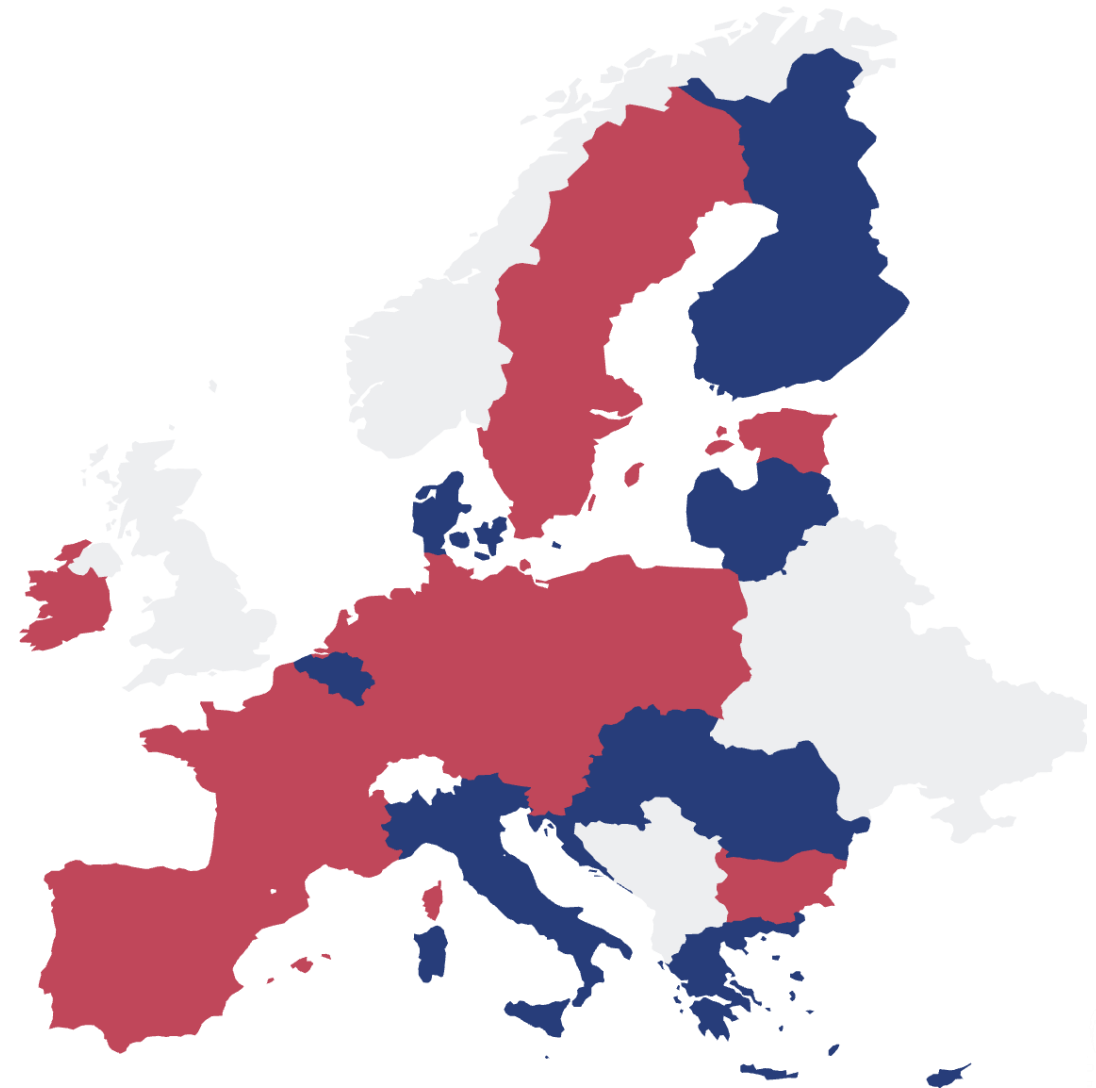
NIS-2 in international context



ecs-org.eu/activities/nis2-directive-transposition-tracker/

NIS-2

■ Transposed ■ Draft Law



SECTORS OF HIGH CRITICALITY (Annex I)

- Energy
- Transport
- Banking
- Financial Market Infrastructure
- Health
- Drinking water
- Waste Water
- Digital infrastructure
- ICT Service management
- Public Administration
- Space

ESSENTIAL

**250+
employees**

Other Critical SECTORS (Annex II)

- Postal and courier services
- Waste management
- Chemical industry and supply chain
- Food supply chain
- Manufacturing (limited)
- Digital providers
 - Online marketplace
 - Search engines
 - Social networking services platforms
- Research organisations

IMPORTANT

**50-249
employees**

SCOPE



Rijksoverheid

Home > Documenten >

Kamerbrief over voortgang cyberweerbaarheid in het vervolgonderwijs

Kamerstuk | 24-04-2025

Minister Bruins (OCW) informeert de Tweede Kamer over cyberdreiging in het middelbaar beroepsonderwijs (mbo) en hoger onderwijs. Hij bespreekt daarbij de voortgang in de verbetering van de cyberweerbaarheid sinds 2021. Ook gaat hij in op de aanwijzing van instellingen in het hoger onderwijs onder de cyberbeveiligingswet.

➤ [Kamerbrief over voortgang cyberweerbaarheid in het vervolgonderwijs](#)

Bijlagen

> [Beslisnota bij Kamerbrief over voortgang cyberweerbaarheid in het vervolgonderwijs](#)

**Dutch Universities
are now in scope!
(April 2025)**

**They get some
additional time to
comply**



Standards // Duty of Care

ISO 27001/2 (Croatia, Finland, Slovenia)

NIST 800-53 (Cyprus)

NIST CSF (Ireland)

BSI (Germany)

CyberFun (Belgium and others)

CAF (UK)

National Framework (Belgium, Lithuania, Romania)

None specified (Greece, Hungary, Latvia, Slovakia)

...

Source: <https://ecs-org.eu/activities/nis2-directive-transposition-tracker/>

Supply chain

What if?

You are not in scope

But

your main research partner

is in scope

What if?

- **Your research Partner**

- Is in scope
- Will have Duty of Care
- Will impose requirements on suppliers
- Will impose requirements on research agreements

- Will have Duty to Report

- **You**

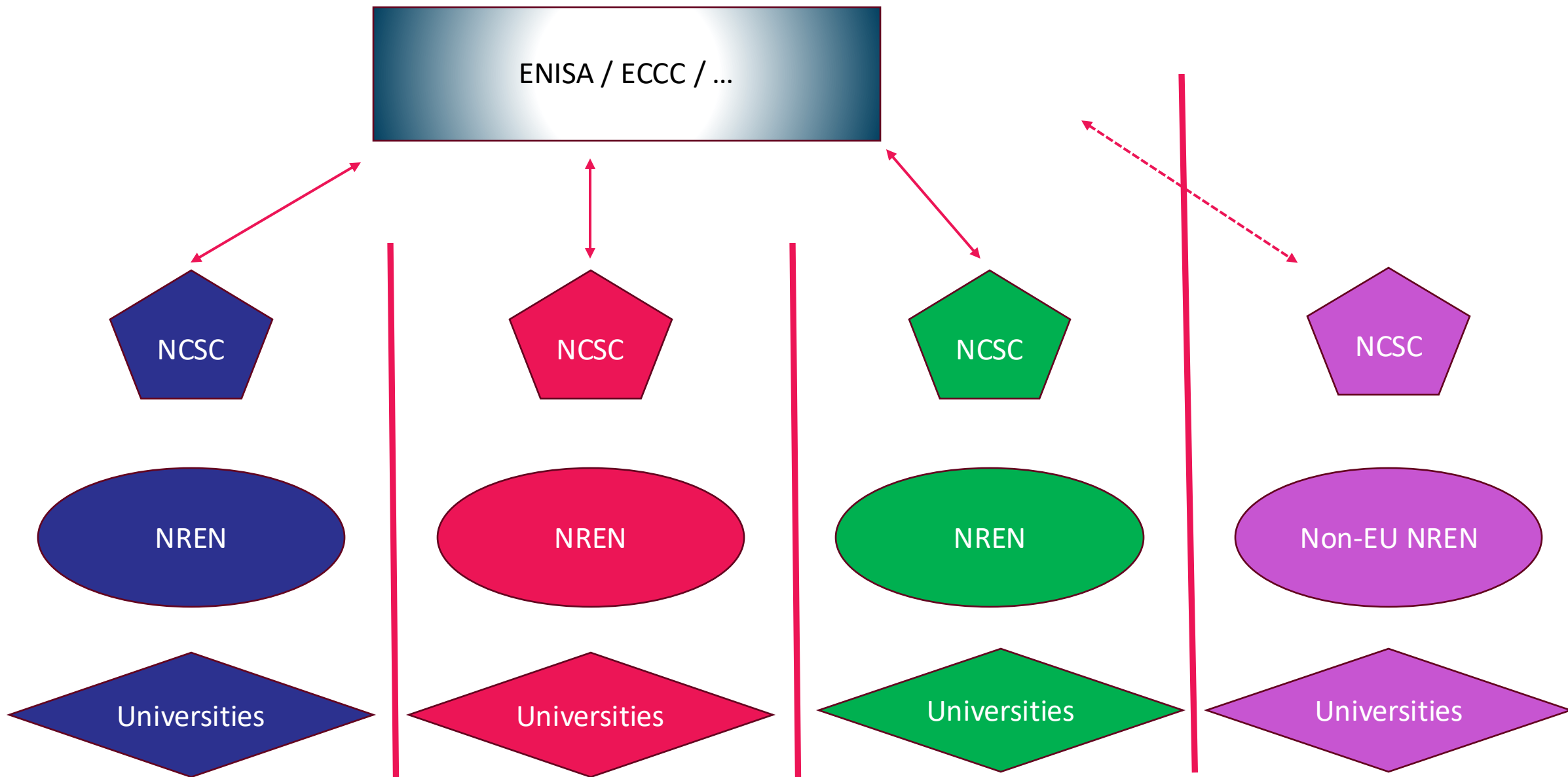
- You are not in scope
- Will already have research agreements with requirements

- Synchronise incident response

EU27 ↔ Europe

National Interest





NIS-2 Bottom Line



Happy with coherent structure and clear rules

Challenge to cope with Babylonian system of standards

Key issues in R&E not solved: Threat intelligence sharing across borders

International sectoral security collaboration not recognised → R&E ISAC

NIS2 Material available for NRENs (and others)

Wiki pages: <https://wiki.geant.org/display/SIGISM/NIS-2+Directive>

Stratix report: <https://resources.geant.org/wp-content/uploads/2023/07/NIS2-Recommendations-for-NRENs.pdf>

Quarterly Infoshares: <https://wiki.geant.org/display/SIGISM/NIS-2+Directive>

GEANT Security Baseline: <https://wiki.geant.org/display/gn43wp8/GEANT+Security+Baseline>

Publications GN5-1

[Holistic Information Security Management and Compliance Framework:
Leveraging Taxonomical Engineering for Security Baseline Compliance](#)

<https://www.wavestone.com/en/insight/nis-2-european-countries-transposing-directive/>

<https://www.openkritis.de/eu/eu-nis-2-member-states.html#overview>



Thank You

www.geant.org



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