



## FONASBA MEMBERSHIP SURVEY

Denmark – 6<sup>th</sup> September 2024

# ECASBA Survey Results: Denmark 2024 - NIS2 Development Status

The EU Directive NIS2 focused on improving cybersecurity and its implementation in Danish legislation. The NIS2 is the abbreviation for "Networks and Information Security Directive", DIRECTIVE (EU) 2022/2555 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 14 December 2022<<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02022L2555-20221227&qid=1724841892461>>. It is a Directive to strengthen cybersecurity and to enhance the number of companies, entities, institutions, and authorities that are affected by the Directive

While Denmark was making progress, we understood how far other countries had come with their own NIS2 implementation.

Therefore, we have prepared the results from ECASBA members who provided insights into the status of this project in their countries.



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## QUESTIONS AND ANSWERS:

1. Has your member state integrated the NIS2 Directive into the national legislation? (Y/N)

YOUR COUNTRY	NAME OF YOUR ASSOCIATION/COMPANY	Has your member state integrated the NIS2 Directive into the national legislation? (Y/N)
Belgium	NAVES VZW	Yes
Croatia	ASBA Croatia	Yes
Cyprus	Cyprus Shipping Association	Not yet, however, the draft legislation will be submitted within the coming weeks.
Finland	Shipbrokers Finland	Yes, they have started.
Finland	Shipbrokers Finland	
France	AMCF	Yes
Greece	International Maritime Union in Greece	
Netherlands	VNC	Yes
Spain	ASECOB	No
Türkiye	The Shipowners And Agents Association - Istanbul	muhammet@vda.org.tr



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2. Have your authorities announced the implementation date to 1. January 2025? Yes/no

YOUR COUNTRY	NAME OF YOUR ASSOCIATION/COMPANY	Have your authorities announced the implementation date to 1. January 2025? Yes/no
Belgium	NAVES VZW	No
Croatia	ASBA Croatia	No
Cyprus	Cyprus Shipping Association	Implementation is expected to be the date set in the directive, i.e., 18 October 2024.
Finland	Shipbrokers Finland	Yes and no :-)
Finland	Shipbrokers Finland	No
France	AMCF	No
Greece	International Maritime Union in Greece	No
Netherlands	VNC	During 2025 ('in de loop van 2025') => <a href="https://www.versterkencyberweerbaarheid.nl/onderwerpen/nis2-richtlijn">https://www.versterkencyberweerbaarheid.nl/onderwerpen/nis2-richtlijn</a>
Spain	ASECOB	No
Türkiye	The Shipowners And Agents Association - Istanbul	N/A



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3. If not, what date have they announced, if any?

YOUR COUNTRY	NAME OF YOUR ASSOCIATION/COMPANY	If not, what date have they announced, if any?
Belgium	NAVES VZW	18 October 2024
Croatia	ASBA Croatia	15th February 2025, with a year after which each entity must comply with all provisions of the subject Directive.
Cyprus	Cyprus Shipping Association	N/A
Finland	Shipbrokers Finland	The NIS2 Directive enters into force on 16 January 2023, and its requirements must be transposed into national law by 16 October 2024.
Finland	Shipbrokers Finland	The discussion is still going on in the parliament of Finland, probably ending between 7.2.-28.2.2025.
France	AMCF	1st quarter 2025.
Greece	International Maritime Union In Greece	Not available.
Netherlands	VNC	See 6
Spain	ASECOB	
Türkiye	The Shipowners And Agents Association - Istanbul	N/A



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4. Do you predict any significant delays or obstacles in fully implementing NIS2 in your country?

YOUR COUNTRY	NAME OF YOUR ASSOCIATION/COMPANY	Do you predict any significant delays or obstacles in fully implementing NIS2 in your country?
Belgium	NAVES VZW	The legislative framework is ready, but companies are still looking for answers - the scope is not always clear, see the next point.
Croatia	ASBA Croatia	No
Cyprus	Cyprus Shipping Association	Minor delays may occur.
Finland	Shipbrokers Finland	No (and yes...)
Finland	Shipbrokers Finland	No
France	AMCF	Yes, we expect a full implementation during the 1st semester of 2025.
Greece	International Maritime Union in Greece	
Netherlands	VNC	No
SPAIN	ASECOB	Yes
TÜRKİYE	The Shipowners And Agents Association - Istanbul	No, for the time being.



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5. Any other comments you might want to share that others would find helpful.

YOUR COUNTRY	NAME OF YOUR ASSOCIATION/COMPANY	Any other comments you might want to share that others would find helpful.
Belgium	NAVES VZW	We are talking to the Belgian Centre for Cyber Security and the National Authority for Maritime Security. There is a link with the recent Belgian maritime security law, where ship's agents are considered entities with an impact on maritime security, and therefore must meet minimum requirements in terms of IT security. The exact scope of NIS2 with regard to ship's agents has yet to be defined in consultation with these authorities.
Croatia	ASBA Croatia	N/A
Cyprus	Cyprus Shipping Association	N/a
Finland	Shipbrokers Finland	It takes a lot of work to implement... and keep everyone aware they must do something.
Finland	Shipbrokers Finland	
France	AMCF	
Greece	International Maritime Union in Greece	
Netherlands	VNC	In the Netherlands, the NIS2 Directive will be implemented through the Cybersecurity Act (Cbw), replacing the current Network and Information Systems Security Act (Wbni). Local authorities are classified as essential entities under NIS2 because they provide critical services like road management and wastewater supply.
Spain	ASECOB	The current minority in parliament is delaying many initiatives. The directive has not yet been transposed into National Legislation.
Türkiye	The Shipowners And Agents Association - Istanbul	Türkiye is not a member of the European Union.



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ADDITIONAL QUESTION - We would appreciate your input regarding the applicability of the NIS2 directive and its national implementation to ship agents. Specifically, we are seeking to understand whether

YOUR COUNTRY	NAME OF YOUR ASSOCIATION/COMPANY	ADDITIONAL QUESTION - We would appreciate your input regarding the applicability of the NIS2 directive and its national implementation to ship agents. Specifically, we are seeking to understand whether
Belgium	NAVES VZW	
Croatia	ASBA Croatia	
Cyprus	Cyprus Shipping Association	
Finland	Shipbrokers Finland	
Finland	Shipbrokers Finland	There has been some discussion on this topic in Finland, but the issue has mainly been the role of the ports in supervising other companies.
France	AMCF	
Greece	International Maritime Union in Greece	Not yet incorporated in Greek national legislation.
Netherlands	VNC	
Spain	ASECOB	N/A
Türkiye	The Shipowners And Agents Association - Istanbul	N/A