



## Critical Entities Resilience Directive COLPOFER members' survey

79<sup>th</sup> COLPOFER General Assembly – Pietrarsa, 17-19 June 2025



# Information about the Survey

The survey on CER Directive was requested by Ferrovie dello Stato (FS), in order to understand the advancements on CER directive national transpositions and action undertaken by railways companies belonging to COLPOFER.

The survey was made up by 26 questions. Topics included:

- Knowledge and understanding of CER Directive
- National entities supervising the Directive transposition
- Companies' application of CER Directive
- Implementation of risk analysis and measures
- Changes in safety and security measures
- Challenges in implementing the CER Directive



# Feedback

**Chemins de Fer Luxembourgeois CFL**

**MÁV Személyszállítási Zrt. (MÁV Passenger Transport Company)**

**PKP S.A.**

**Finnish Transport Infrastructure Agency / Vöylävirasto**

**PLK S.A.**

**SNCB - Belgian Railway**

**Ferrovie dello Stato Italiane**

**NS**

**EUROSTAR**

**Deutsche Bhan AG**

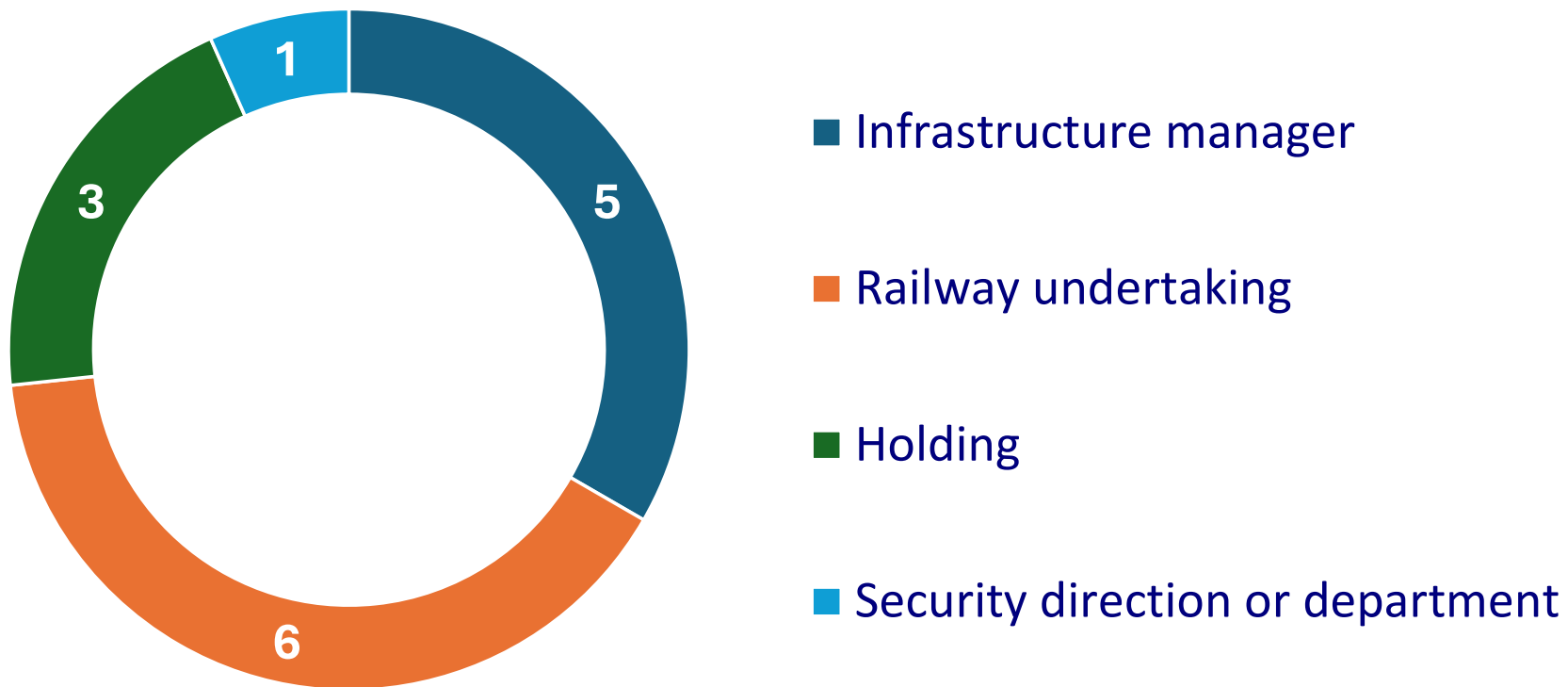




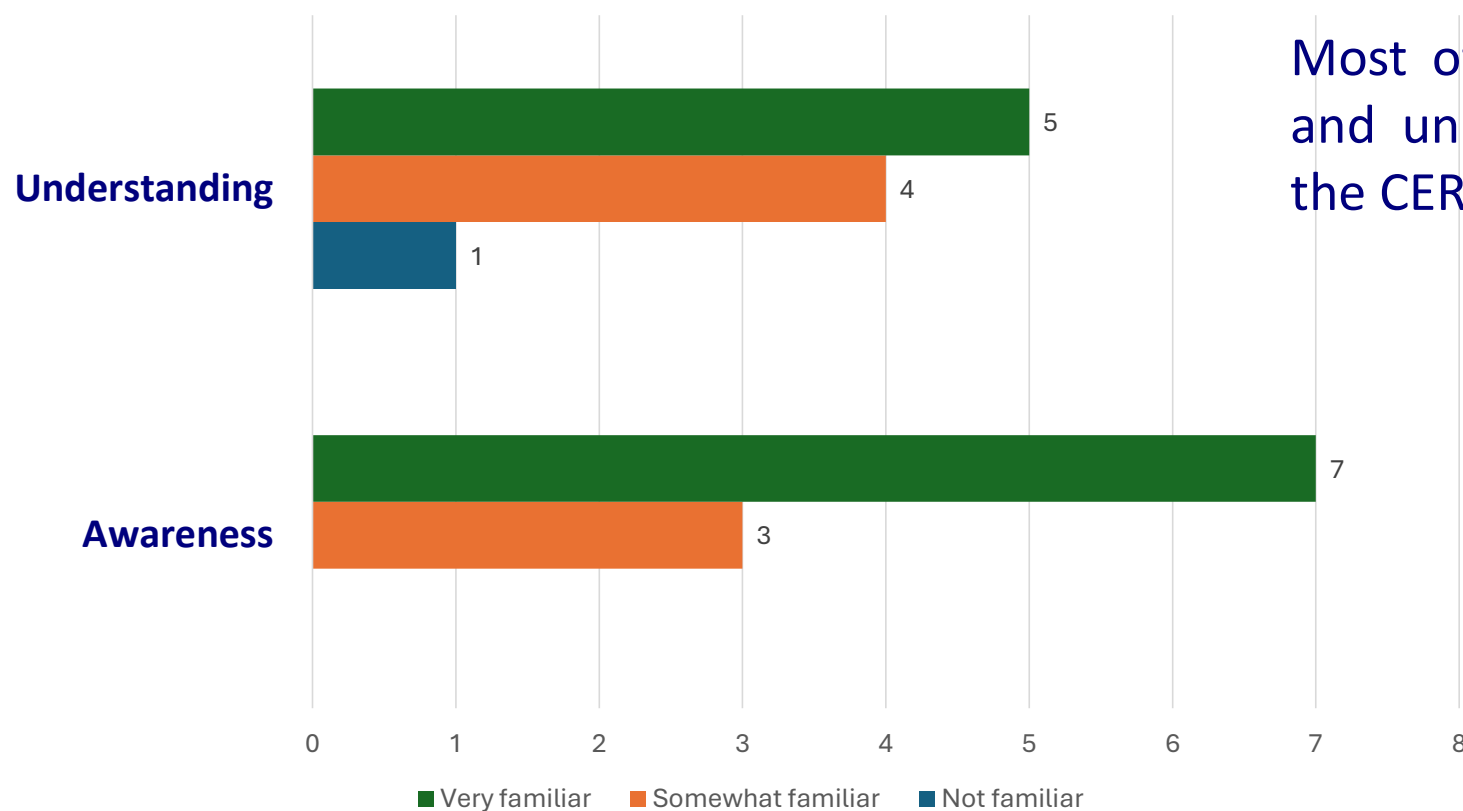
# Survey analysis



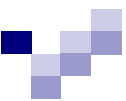
## What type is your company?



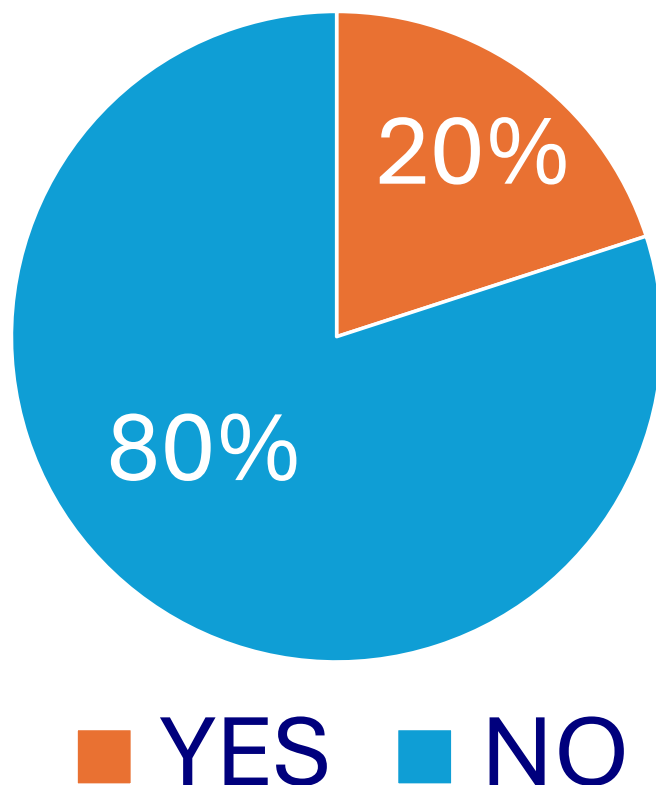
## How familiar is your company with the EU Directive (EU) 2022/2557 on Critical Entities Resilience?



Most of respondents are aware and understand the purpose of the CER Directive.



## Has your Country already transposed the EU Directive (EU) 2022/2557 on Critical Entities Resilience into national law?



Majority of respondents' countries have not transposed the Directive yet.

Those who responded NO, presented variable timeline, spanning from Q2 2025 to Q1 2026. Some have indicated that transposition is underway; some have no specific date.

**In your country, which public administration entity supervises the directive implementation in your sector? (if unknown please mark N/A).**

High Commission of National Protection HCPN.

Ministry of Interior.

Ministry of Infrastructure.

Because the law isn't implemented, it is not certain who supervises it, but most likely it will be Finnish Transport and Communications Agency /Traficom within the transport sector. Concerning all the sectors in Finland the supervisor will be Ministry of the Interior.

Director of the Government Security Centre.

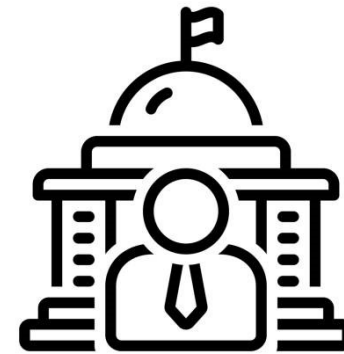
The National Crisis Centre (NCCN) is the public administrative entity designated to oversee the implementation of the directive.

Ministry of Transportation.

Ministry of Infrastructure and Water Management.

FPS mobilit   and transport, National crisis coordinate legislation.

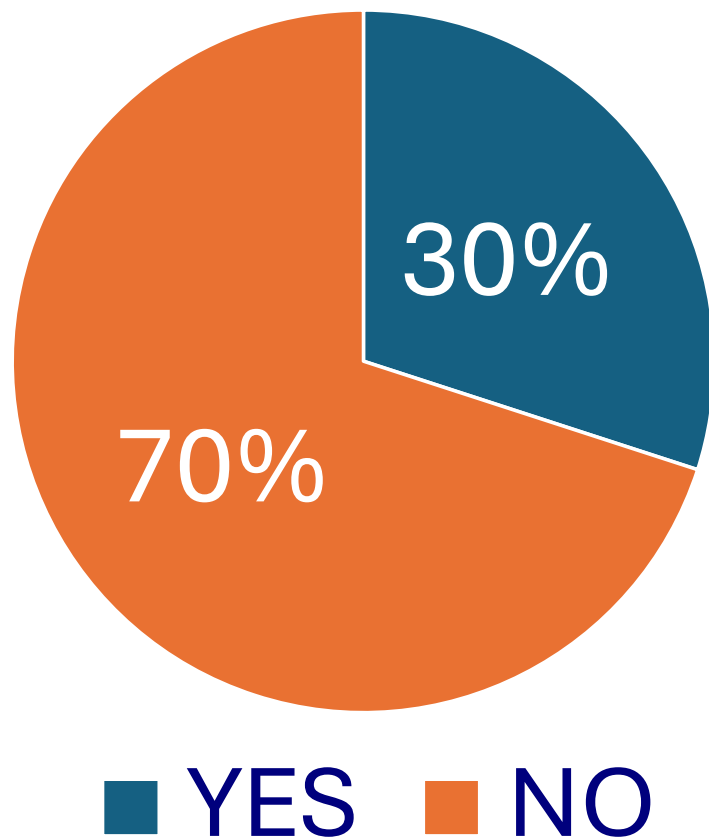
BBK & EBA



National agencies span from Ministries of Transportation to Ministries of Interiors to Crisis Management authorities.



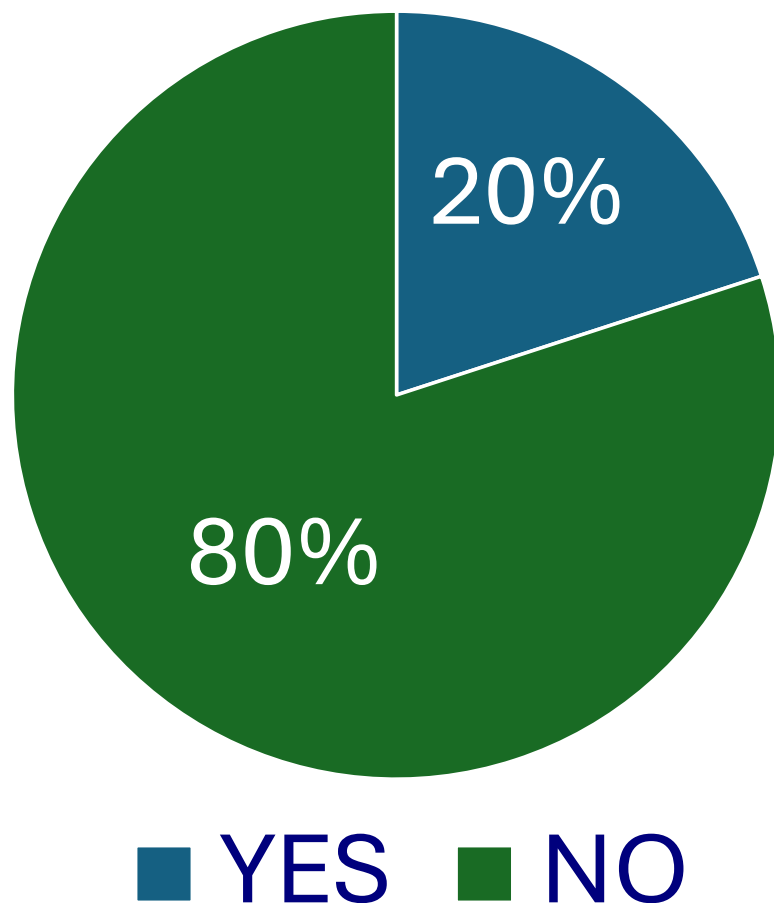
## Has your public administration entity provided guidelines in applying the directive's objectives for enhancing resilience?



Those who responded YES, shared that they received additional information regarding the Directive through meetings, trainings, etc. In addition, in one case, it has been pointed out that there is a specific framework that considers risk assessment, resilience measures, climate adaptation and business continuity.



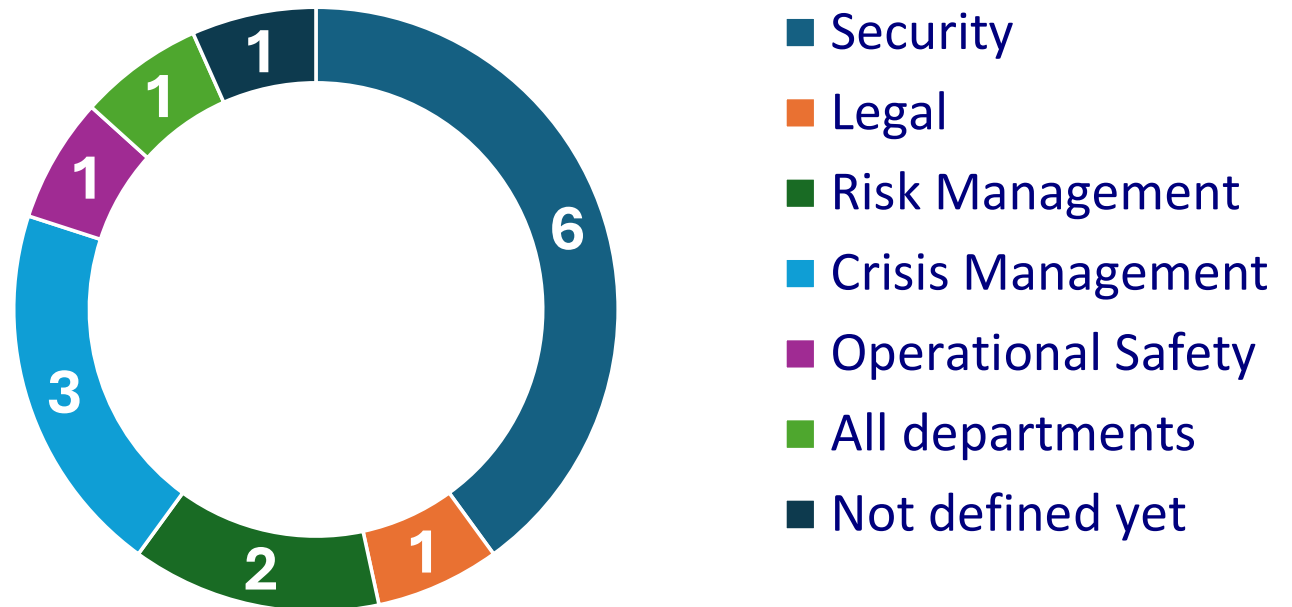
## Has your Country already drafted a national resilience strategy for your sector?



Majority of respondents' Countries have not drafted a national strategy for rail sector resilience.

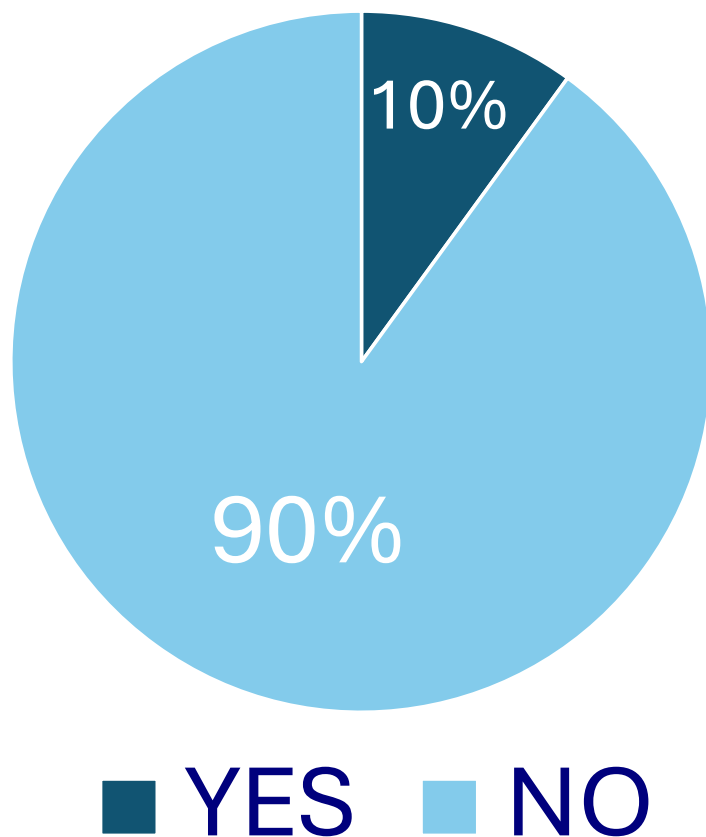
## In your company, which is the department in charge of implementing the EU 2022/2557?

Security department is the most common department in charge of implementing the CER Directive.





## Has your company drafted a plan for implementing (EU) 2022/2557?



Majority of respondents have not drafted a company plan for implementing the Directive.

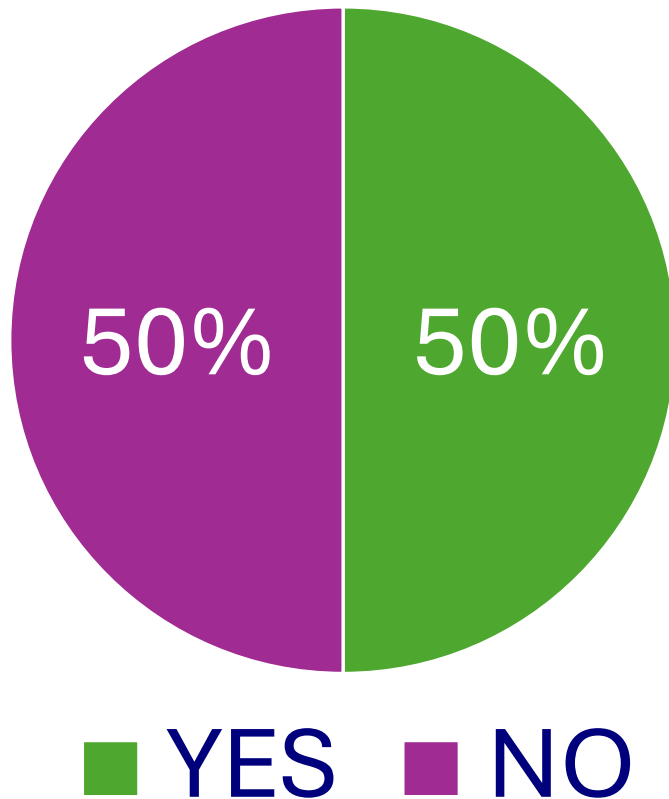
## What measures have been implemented by your company to comply with (EU) 2022/2557? (Select all that apply).



Respondents have indicated what measures have been implemented by their own companies to comply with the CER Directive.

Crisis management model, risk assessment and incident notification stand out.

## Has your company implemented a risk analysis for operational resilience?



Respondents who have answered YES also indicated that they are implementing measures to increase operational resilience that include risk assessment, all-risk approach, adherence to critical infrastructures regulations.

Please indicate how you weighted the following common risks in the railway sector (1 lowest, 5 highest rank).



	1	2	3	4	5	N/A
Seismic	3	2		1		1
Volcanic	5	1				1
Tsunami	5		1			1
Hydrogeologic	2	2	1	1		
Extreme weather				4	2	5
Wildfires	2	1	4			
Drought	2	2	2	1		
Sabotage			3	3	1	
Terrorism		1	2	2	2	
Organized crime			3	2	1	1
Hybrid threat			3	2	1	1
Cyber			2	1	2	2

Respondents weighted from 1 (low) to 5 (high) risks taken into account in the railway sector.

Some natural risks are of low concern among railway companies; anthropic risks receive much more attention (terrorism, cyber and sabotage).

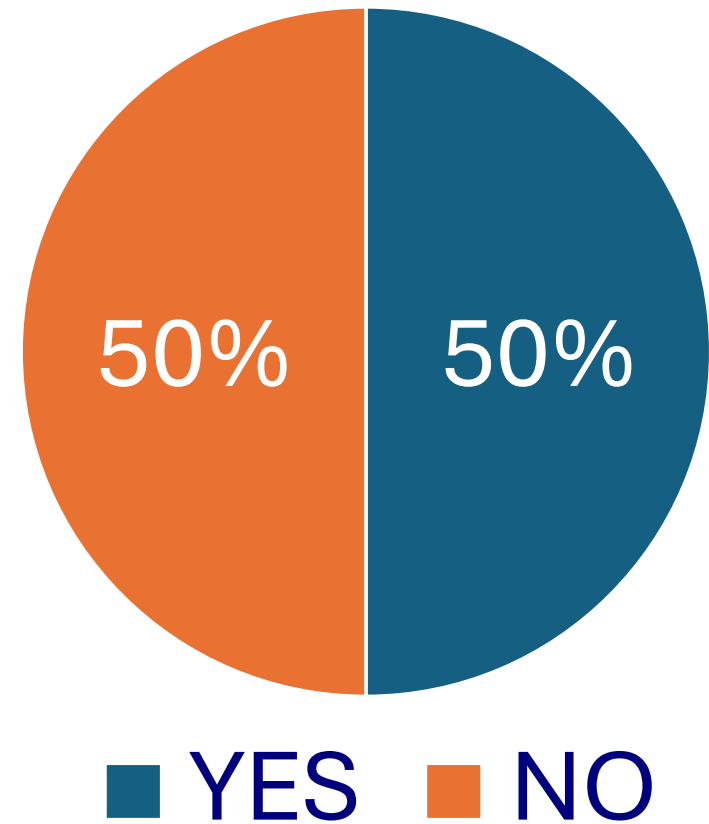
## Have the EU Directive and the risk analysis changed your previously adopted safety and security measures?

The analysis of the additional contributions reveals a growing focus on cyberattack prevention, with particular attention to planning new projects, staff training, and awareness-raising.

Organizations are adopting a more dynamic approach to risk assessment and the implementation of security measures.

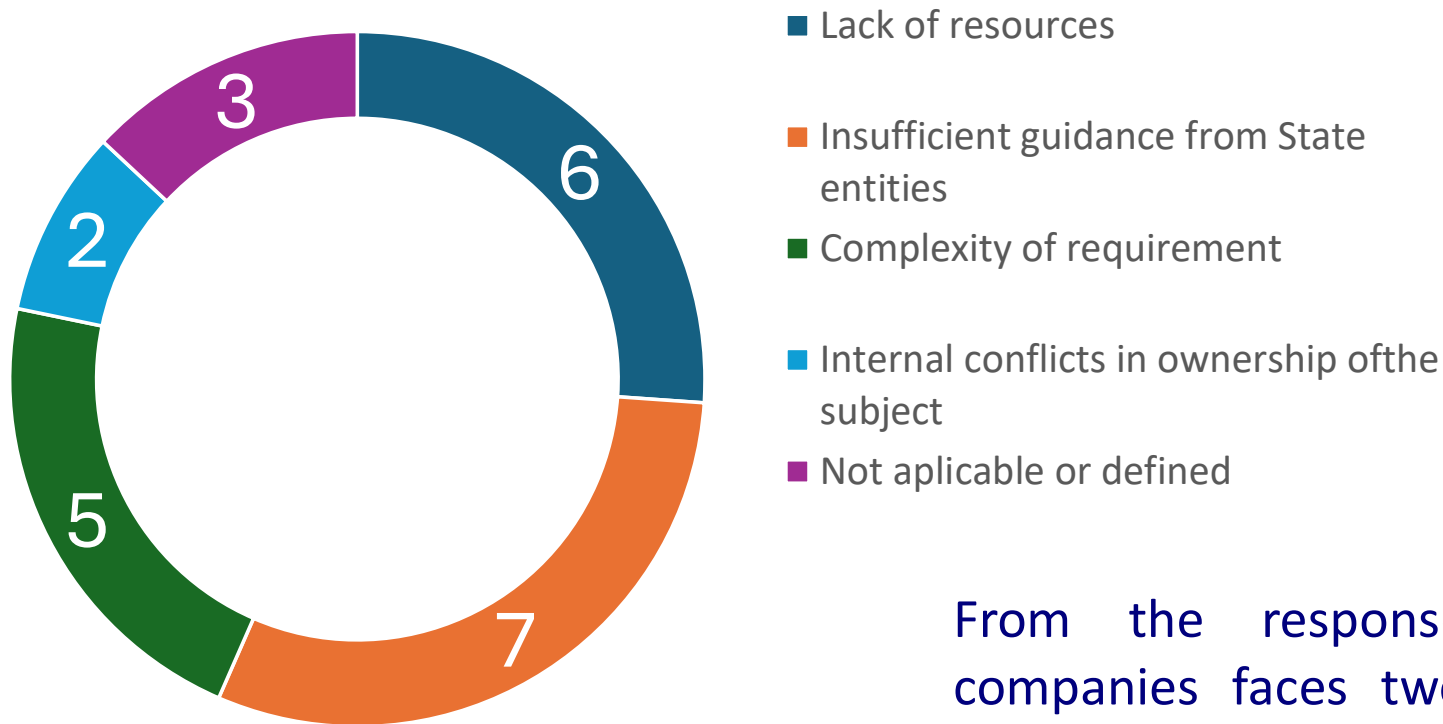
There is also a shift from general strategies to more targeted interventions, especially regarding the protection of critical processes, access control, and business continuity.

Finally, there is an interest in integrating advanced concepts such as climate resilience, standardization of emergency management, and integrated asset protection.





## What challenges do you expect in implementing the directive (EU) 2022/2557? (Select all that apply).



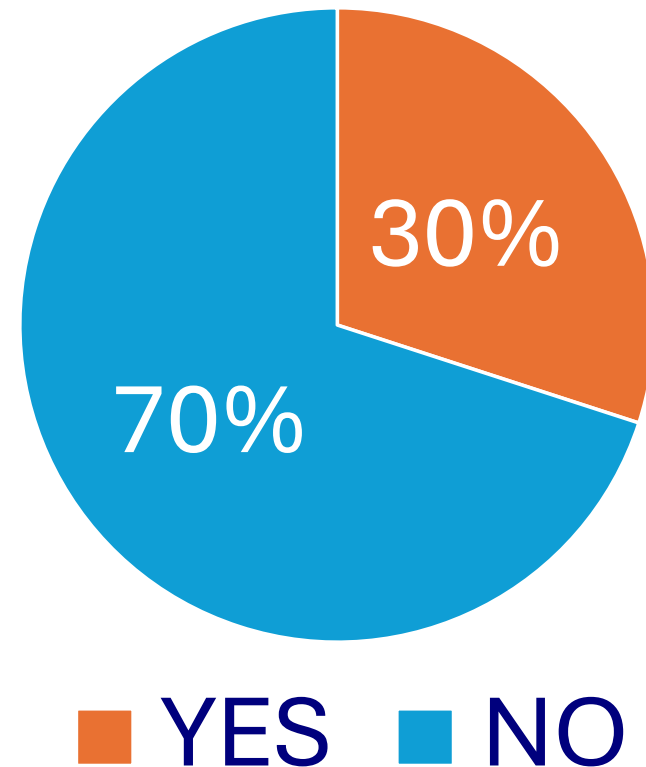
From the responses it emerges that companies face two major challenges: a lack of resources and insufficient guidance from institutional entities.

## Has the public administration entity created working groups between stakeholders to facilitate the implementation of EU 2022/2557?

Additional comments to the responses highlight a limited involvement of company experts in governmental or ministerial working groups.

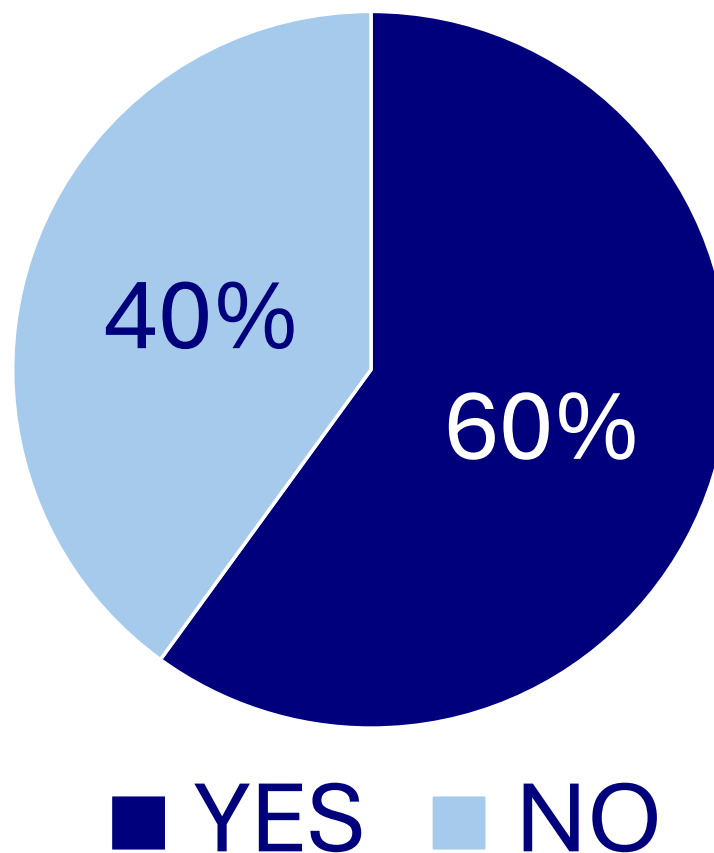
While some working groups have been established at the ministry level, there is a lack of clarity or transparency regarding the participation of private sector stakeholders.

However, the overall level of activity appears low, with many organizations still in a preparatory phase, awaiting clearer guidelines and frameworks before taking more concrete steps.

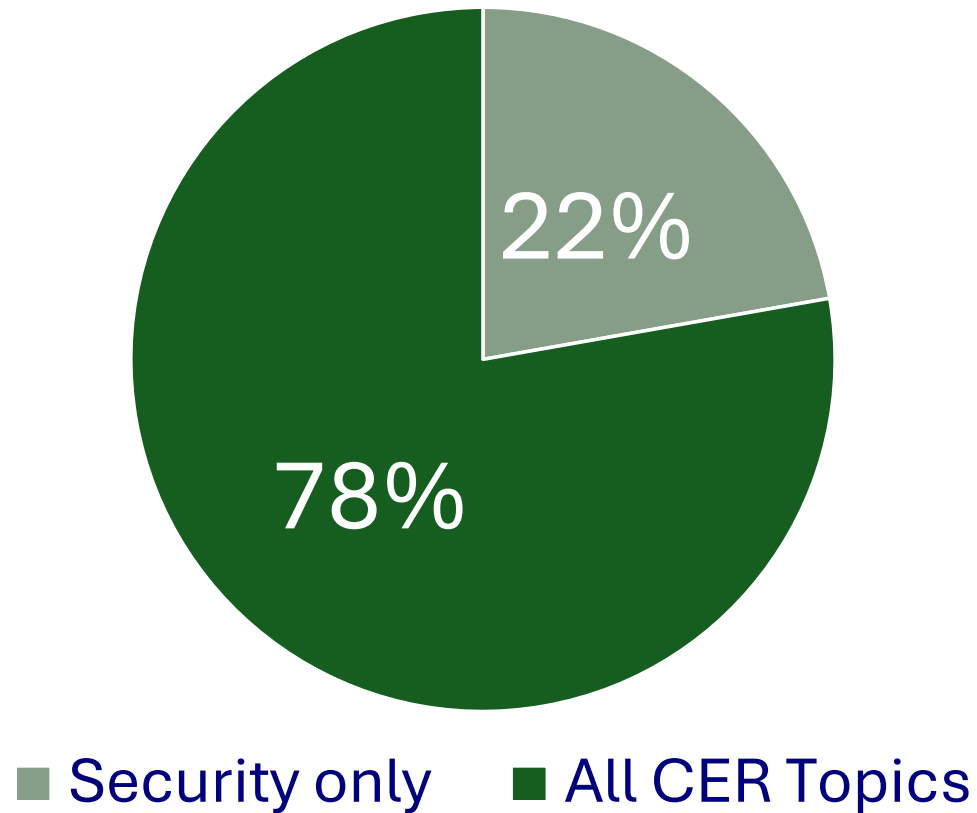




Do you consider coordination at COLPOFER level desirable?

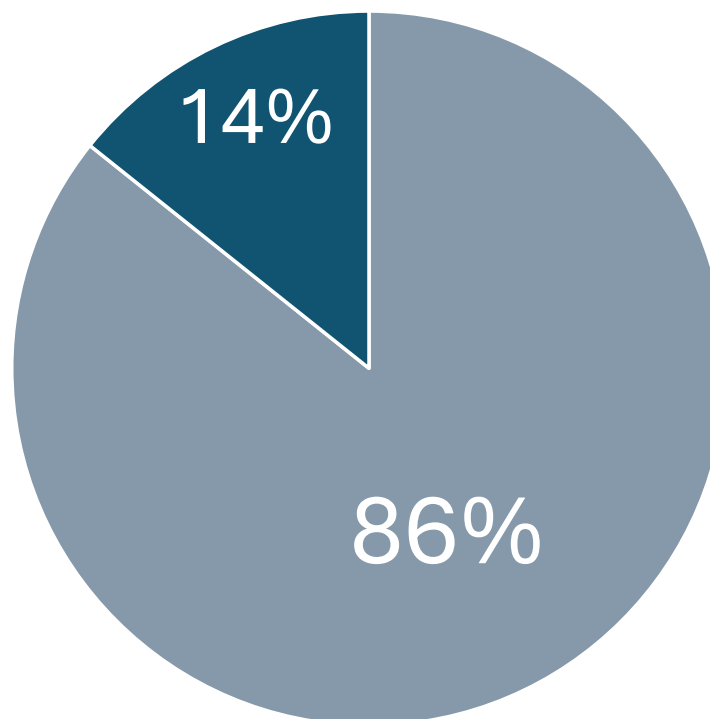


Should the focus be on the security part or on all CER topics (like business continuity, natural disasters etc.)?





**If we start a new working group on the CER Directive, are you willing to?**



■ Participate   ■ Chair the working group