

Question for written answer E-003771/2025
to the Commission
Rule 144
Wouter Beke (PPE)

Subject: Application of the NIS2 Directive

Recent concerns from the Belgian education sector highlight practical difficulties in the implementation of the NIS2 Directive¹. Large school institutions with extensive solar panel installations are formally classified as ‘producers’ of electricity and thus fall within the scope of the directive. However, such entities are not the highly critical operators that the NIS2 Directive was originally intended to cover. The directive’s current simplification provisions are insufficient to address these disproportionate obligations, as these schools remain within the scope of the directive, which imposes significant costs on institutions that often lack in-house cybersecurity expertise.

In the light of the above:

1. Is the Commission prepared to take additional simplification or clarification measures to reduce the disproportionate burdens imposed by the NIS2 Directive on institutions that are not classified among the critical sectors and operators it was originally intended to cover?
2. How does the Commission assess the possibility of simplifying the scope of the directive, for example by introducing clear thresholds, such as 1 megawatt capacity, or exemptions for entities that mainly generate electricity for self-consumption?

Submitted: 29.9.2025

¹ Directive (EU) 2022/2555 of the European Parliament and of the Council of 14 December 2022 on measures for a high common level of cybersecurity across the Union, amending Regulation (EU) No 910/2014 and Directive (EU) 2018/1972, and repealing Directive (EU) 2016/1148 (OJ L 333, 27.12.2022, p. 80, ELI: <http://data.europa.eu/eli/dir/2022/2555/oj> (<http://data.europa.eu/eli/dir/2022/2555/oj>)).