



Position Paper  
Revision of the NIS Directive  
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Considering Europe's ever-growing dependence on information technology, CSC welcomes the Commission's ambition to improve cybersecurity by updating Directive (EU) 2016/1148 on security of network and information systems (NIS Directive). Revision of the Directive offers an opportunity to improve the coherence of the cybersecurity regulation across the Union and to clarify certain terminological issues as well as the rules concerning information sharing.

In order to reduce fragmentation of the single market and to ensure a level playing field for operators covered by the NIS Directive, it is imperative to work towards more harmonised implementation of the Directive across the Union. Currently an operator active in more than one member state has to adapt to several different national rules which causes unnecessary inefficiencies and administrative burden. Further harmonisation of the cybersecurity rules would be in line with the Commission's longstanding ambitions for better regulation and a more integrated internal market.

As to the terminology of the Directive, clearly distinct terms should be used for the national CSIRTs run by public authorities and other CSIRTs (e.g. NREN CSIRTs). Among practitioners the differentiation is made by talking about national CSIRTs and common CSIRTs. Systematic use of these established terms in the Directive would make it clearer to whom its stipulations are addressed. The same distinction should be made for the networks of CSIRTs (national CSIRT network and common CSIRT network).

One of the key issues to be tackled in the revision of the NIS Directive are the rules pertaining to information sharing among the CSIRTs. The common CSIRT co-operations should be supported as a model of sharing e.g. IOC or threat information. Sharing that kind of information without a legal barrier or delay caused by intermediaries could save a lot of time and money needed for incident mitigation. A national CSIRT could nominate a trusted local common CSIRT actor as a trusted party of this new information sharing ring and could also define what kind of information should and could be shared.

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