

TRAFICOM

Liikenne- ja viestintävirasto

Implementation of NIS2 & CRA requirements in Finnish ITS sector

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Finnish ITS sector and NIS2 entities

- The broad definition of Intelligent Transport Systems vs. the legal definition of ITS
 - 'Intelligent Transport Systems' or 'ITS' means systems in which information and communication technologies are applied in the field of road transport, including infrastructure, vehicles and users, and in traffic management and mobility management, as well as for interfaces with other modes of transport
- Current NIS2 sector (strongly defined by previous legislation):
 - Traffic Management
 - National open data information system that contains the centre line geometry and key characteristics of the entire Finnish road and street network
 - Information system that contains open data for application development from Finnish road, railway and marine traffic
 - eCall provider (Emergency Response Centre Agency)
 - Capital Region Journey Planner
 - = 4 major entities



NIS2 oversight – planning

- NIS2 directive implemented nationally in national Cybersecurity Act, in force since 4/25
- Risk-based oversight
 - Inspections, documentation checks, requests for information
 - Current oversight focus on documentation, processes, cybersecurity risk management, governance, compliance, OT systems – not so much traditional ICT
 - NIS2 incident reports and occurrences
- Yearly updated oversight plan
- Ad hoc oversight based on severe occurrences



NIS2 oversight – implementation

- Initial oversight round 2025:
 - Requests for information → analysis of replies → decisions on further oversight for 2026
 - Part of official oversight, implications for not replying
 - Questions, implementation challenges, assessment of compliance level
 - Entity registration checks
- Customers' own suggestions for further oversight actions



A few words on CRA

- Cyber Resilience Act, sets out cybersecurity requirements for products
- In Finland Traficom is responsible for the authority tasks
 - Indirect supervision: market surveillance and supervision of notified bodies, not direct oversight of products
 - While overseeing NIS2 entities Traficom may ensure that they use CRA compliant products



Conclusions

- Only a few large NIS2 ITS entities
- On one hand a too broad but on the other hand a too narrow definition for ITS
- In the future for new ITS entities:
 - 1) ITS operations
 - 2) NIS2 size criteria
 - 3) Entity's own opinion
- Entities responsibility to register, not authority's responsibility to identify!
- Advisory services always available
- Voluntary NIS2 compliance very welcome!
- Link to CER



Up for discussion

- Do entities consider their responsibilities and documentation requirements clear enough?
- How should entity prepare in advance, before authority supervision?
- Is it clear what is expected?



Thank you!