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Finland

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National Plan for the Resilience of Critical Entities

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National Plan for the Resilience of Critical Entities

Ministry of the Interior

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National Plan for the Resilience of Critical Entities

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Abstract

The Act on the Protection of Infrastructure Critical to Society and on the Improvement of Resilience (310/2025, CER Act) entered into force on 1 July 2025. The CER Act transposed the EU Directive on the resilience of critical entities (EU) 2022/2557 (the Critical Entities Resilience (CER) Directive) into national law. The Act requires that a national plan for the resilience of critical entities be adopted every four years.

This national plan sets out the objectives, priorities and key measures for enhancing the resilience of critical entities, as well as the governance framework supporting those objectives, priorities and measures. The plan also describes the process for identifying critical entities.

The national plan includes descriptions of the processes supporting critical entities and of measures to promote cooperation between public and private entities. It also includes measures to support businesses in meeting their resilience obligations. In addition, the plan sets out a policy framework for cooperation between the authorities under the CER and NIS2 directives. The national plan serves as a national strategy for the resilience of critical entities.

Keywords	CER, resilience, critical entities, critical infrastructure, preparedness, EU, safety, security		
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Kriittisten toimijoiden häiriönsietokykyä koskeva valtakunnallinen suunnitelma

Sisäministeriön julkaisuja 2026:18		Teema	Sisäinen turvallisuus
Julkaisija	Sisäministeriö		
Yhteisötekijä	Sisäministeriö		
Kieli	englanti	Sivumäärä	20
Tiivistelmä			
Laki yhteiskunnan kriittisen infrastruktuurin suojaamisesta ja häiriönsietokyvyn parantamisesta (310/2025) tuli voimaan 1.7.2025. Lailla pantiin kansallisesti täytäntöön Euroopan unionin kriittisten toimijoiden häiriönsietokyvystä annettu CER-direktiivi (EU) 2022/2557. Laki edellyttää kriittisten toimijoiden häiriönsietokykyä koskevan valtakunnallisen suunnitelman hyväksymistä neljän vuoden välein. Tässä valtakunnallisessa suunnitelmassa määritetään kriittisten toimijoiden häiriönsietokyvyn parantamisen tavoitteet, painopisteet, keskeiset toimenpiteet sekä niitä tukeva ohjauskehys. Lisäksi kuvataan kriittisten toimijoiden määrittämisprosessi. Valtakunnallinen suunnitelma sisältää kuvaukset kriittisiin toimijoihin kohdistuvista tukiprosesseista sekä toimenpiteistä, joilla edistetään julkisten ja yksityisten toimijoiden välistä yhteistyötä. Valtakunnallinen suunnitelma sisältää myös toimenpiteet, joilla tuetaan yrityksiä häiriönsietokykyä koskevien velvoitteiden täyttämisessä. Lisäksi suunnitelmassa määritetään toimintapuitteet CER- ja NIS2-direktiivien mukaiselle viranomaisten yhteistyölle. Valtakunnallinen suunnitelma toimii kriittisten toimijoiden häiriönsietokykyä koskevana kansallisena strategiana.			
Asiasanat	kriittinen infrastruktuuri, varautuminen, EU, turvallisuus, CER, häiriönsietokyky, kriittiset toimijat		
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Riksomfattande plan för kritiska aktörers motståndskraft

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Lagen om skydd av samhällets kritiska infrastruktur och om stärkande av samhällets motståndskraft (310/2025) trädde i kraft den 1 juli 2025. Genom lagen genomfördes EU:s direktiv (EU) 2022/2557 om kritiska entiteters motståndskraft, CER-direktivet, nationellt. Lagen förutsätter att en riksomfattande plan för kritiska aktörers motståndskraft antas vart fjärde år.

I denna riksomfattande plan fastställs målen, prioriteringarna och de centrala åtgärderna för att stärka kritiska aktörers motståndskraft samt en styrningsram till stöd för dessa. Dessutom ingår en beskrivning av den process genom vilken kritiska aktörer identifieras.

Den riksomfattande planen innehåller beskrivningar av processerna till stöd för kritiska aktörer och åtgärderna för att förbättra samarbetet mellan offentliga och privata aktörer. Den riksomfattande planen innehåller också en beskrivning av de åtgärder som gör det lättare för företag att genomföra skyldigheterna i fråga om motståndskraft. I planen fastställs dessutom en policyram för samordning mellan de behöriga myndigheterna enligt CER-direktivet och NIS2-direktivet. Den riksomfattande planen fungerar som nationell strategi för kritiska aktörers motståndskraft.

Nyckelord	kritisk infrastruktur, beredskap, EU, säkerhet, CER, motståndskraft, kritiska aktörer
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1 Introduction

Finland's security environment has changed fundamentally and in the long term. Threats to internal and external security are closely intertwined, which is why the current security situation requires coordinated measures to strengthen the resilience of national and cross-border critical infrastructure. Governmental hybrid influence activities, sabotage operations and increased intelligence activities pose a threat to both the public and private sectors.

Directive (EU) 2022/2557 of the European Parliament and of the Council on the resilience of critical entities (CER Directive) and the Act on the Protection of Infrastructure Critical to Society and on the Improvement of Resilience (310/2025, CER Act), which entered into force on 1 July 2025, require Finland and other Member States (directive) to improve the resilience and preparedness of critical entities.

In accordance with Article 4 of the CER Directive, each Member State must adopt a national strategy setting out the strategic objectives and measures for enhancing the resilience of critical entities. The strategy must be based on a risk-based approach and build on existing national and sectoral strategies. Section 5 of the CER Act lays down provisions on a national plan for the resilience of critical entities that is equivalent to the national strategy referred to in Article 4 of the CER Directive.

This plan serves as the national strategy for enhancing the resilience of critical entities (CER strategy). The strategy describes common objectives, priorities and measures to improve the resilience of critical entities. In addition, it guides the authorities and entities in promoting the protection of critical infrastructure and strengthening the resilience of critical entities in a consistent manner and on the basis of common principles.

The strategy was prepared by a cross-administrative working group consisting of representatives of ministries, the National Emergency Supply Agency and the Secretariat of the Security Committee. The term of the working group ran from 1 February 2026 to 30 April 2026. Government resolutions and other decisions central to the strategy were taken into account in the preparation of the strategy. The strategy remains in force for up to four years.

2 Key authorities and governance framework

2.1 Key authorities

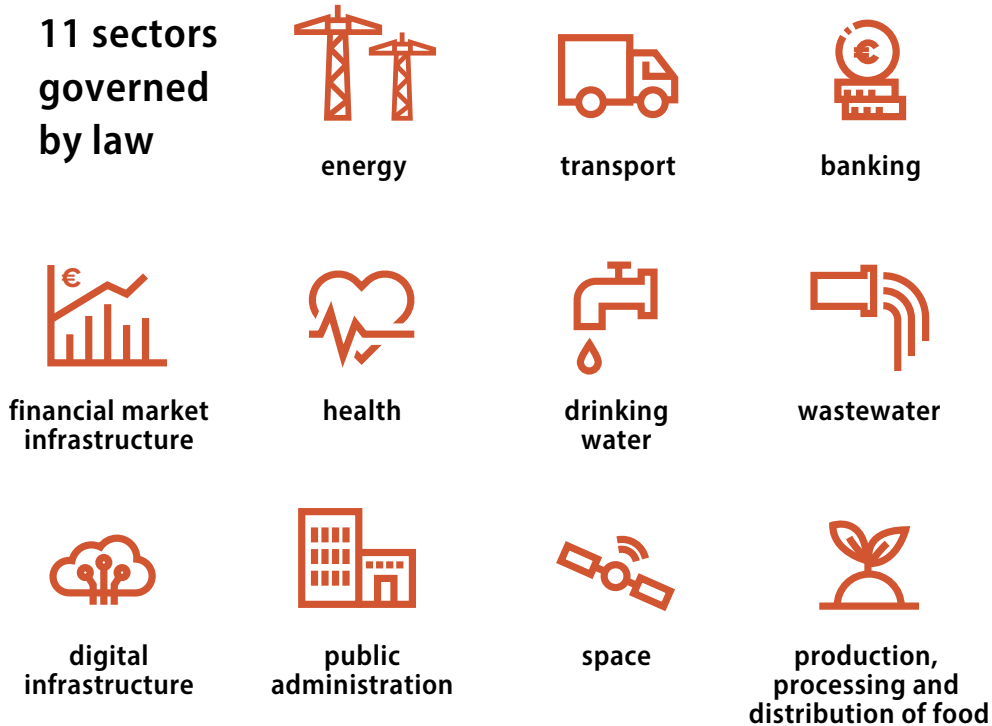
Key authorities and stakeholders involved in the implementation and guidance of the strategy:

- **The Ministry of the Interior** is the coordinating ministry responsible for general guidance, monitoring, coordination and development of the activities under the CER Act.
- **Ministries** are responsible for identifying critical entities in their respective sectors and for guiding the supervisory authorities. The duties of the ministries also include measures related to resilience as referred to in section 8 of the CER Act.
- **Supervisory authorities** supervise compliance with the obligations laid down for critical entities, provide advice on the interpretation of the Act, and support the development of risk management and the strengthening of the resilience of critical entities. The supervisory authorities are the following: the Energy Authority; the Economic Development Centre of Southeastern Finland; the Finnish Transport and Communications Agency (Traficom); the Finnish Medicines Agency (Fimea); the Finnish Food Authority; the Finnish Safety and Chemicals Agency (Tukes); and the Finnish Supervisory Agency. The Financial Supervisory Authority is the competent authority referred to in Article 9(1) of the CER Directive in respect of the banking and financial market infrastructure sectors.
- **The National Emergency Supply Agency** participates in the work to improve the resilience of critical entities and in providing support to the entities together with the Ministry of the Interior, other ministries and supervisory authorities. In addition, the National Emergency Supply Agency promotes, in cooperation with other authorities and businesses, the protection of critical infrastructure essential for security of supply.
- **The Government Situation Centre** serves as the single point of contact, receives incident notifications, and communicates the necessary notifications and information to the Commission.

2.2 Governance framework and monitoring

The Ministry of the Interior acts as the coordinating ministry referred to in section 7 of the CER Act. The Ministry of the Interior is responsible for general guidance, monitoring, coordination and development of activities under the CER Act. Ministries guide the activities of their own sectors and identify the critical entities in their respective sectors. The sectors under the CER Act are shown in Figure 1. The sector-specific subsectors are listed in the Annex to the CER Directive, 'Sectors, subsectors and categories of entities'.

Figure 1. Sectors under the CER Directive



The supervisory authorities supervise compliance with the obligations imposed on critical entities and support the development of risk management. In addition, the supervisory authorities and the Financial Supervisory Authority develop and support the resilience of critical entities in cooperation with the competent ministries and the National Emergency Supply Agency.

Guidance ensures that efforts to enhance the resilience of critical entities progress in a planned and consistent manner across branches of government. Cooperation groups may be established to coordinate the implementation of the obligations under the CER Act imposed on the Ministry of the Interior, other ministries, supervisory authorities and the National Emergency Supply Agency.

The implementation of the plan will be monitored regularly. Clear procedures will be developed for monitoring to assess the implementation of the plan, the effectiveness of the measures and possible needs for change. Permanent structures, such as cooperation networks, may be established to strengthen cooperation. Regular exercises may also be organised to support continuous exchange of information and joint development of activities between the different entities. As the implementation progresses, the procedures will be specified, taking into account national needs, the special characteristics of the operating environment and EU-level regulation.

For Åland, an act of Åland on cybersecurity and resilience (*landskapslag om cybersäkerhet och motståndskraft*, ÅFS 2025:57) has been adopted to implement the NIS2 Directive and the CER Directive in Åland.

3 Identifying critical entities

Identifying critical entities is based on the criteria laid down in the CER Act. The aim of this process is to identify entities whose services are vital to the functioning of society and where disruptions could have wide-ranging effects on maintaining services essential to vital societal functions, economic activities, public health and safety, or the environment. In addition to the national plan, the identification of critical entities takes account of the national CER risk assessment, cross-border activities and the need for European comparability. Matters concerning the identification of a critical entity are decided by the ministry within whose sector the entity falls.

The decision concerning the identification of a critical entity is an administrative decision under the Administrative Procedure Act. The ministries identify the entities in their sector whose services are crucial for the maintenance of vital societal functions, economic activities, public health and safety, or the environment. Before the decision is made, statements under the CER Act are requested from the coordinating ministry and, if necessary, from the National Emergency Supply Agency and other authorities.

After the statements have been processed, the entity concerned is given an opportunity to be heard and provided with information that affected the decision. After the hearing, the relevant ministry will make an administrative decision, based on overall consideration, on whether the entity meets the conditions for being identified as a critical entity. The decision is made in the manner required by the Administrative Procedure Act. The Ministry of the Interior coordinates and harmonises the overall process and maintains a national list of critical entities.

A decision to identify an entity as critical remains in force for up to four years. The relevant ministry may also revoke a decision to identify an entity as critical if the entity no longer meets the conditions set out in the decision or has ceased operations.

Identifying critical entities

An entity may be identified as critical if it

1. operates in a sector specified in the CER Act
 2. provides one or more services essential for the functioning of society¹
 3. operates in Finland, and the critical infrastructure owned, controlled or used by the entity is located in Finland
 4. AND if disruptions or interruptions in service provision would have significant disruptive effects
- on the provision of one or more essential services by the entity, OR
 - on the provision of other essential services in sectors dependent on the service.

1 The Commission has adopted delegated Regulation (EU) 2023/2450 supplementing Directive (EU) 2022/2557 of the European Parliament and of the Council by establishing a list of essential services: https://eur-lex.europa.eu/legal-content/en/TXT/PDF/?uri=OJ:L_202302450.

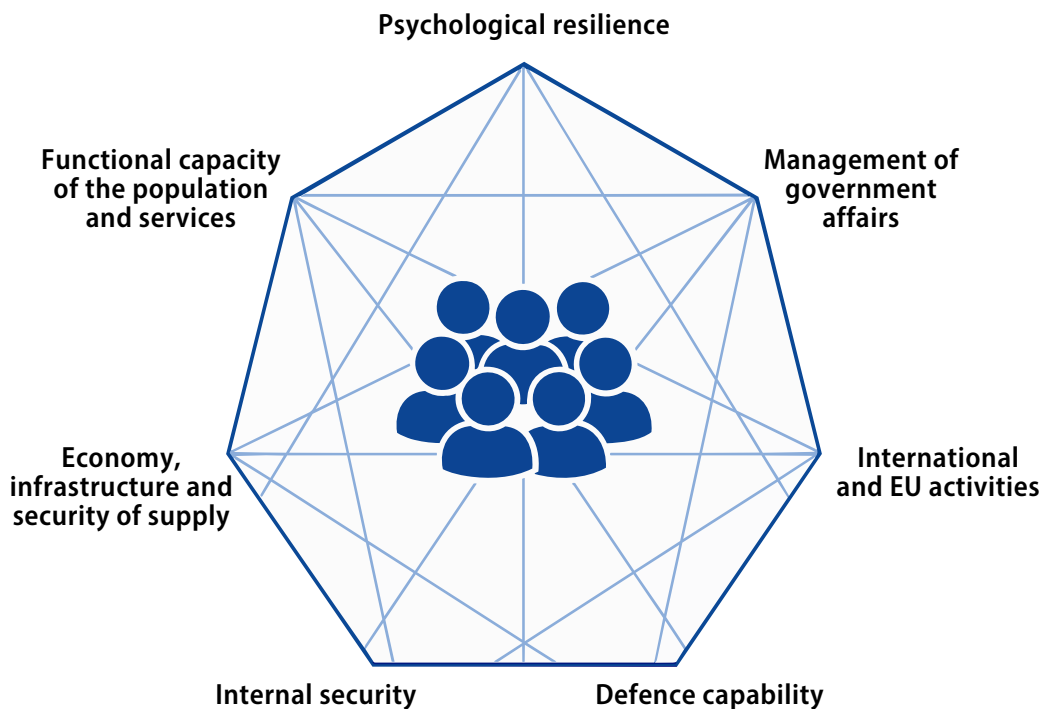
4 Objectives, priorities and measures

4.1 Objectives

Finland's objective is to enhance the resilience of critical entities. This objective will be achieved through preventive risk management measures, such as preparedness-related plans binding on entities, technical solutions and the reporting of incidents. Cooperation between critical entities and authorities will strengthen and harmonise resilience at both European Union and national levels, taking into account the policies set out in the Security Strategy for Society, the revised legislation on security of supply and other national guidance documents. In this work, account should also be taken of the EU's activities supporting crisis preparedness.

Enhancing the resilience of critical entities and protecting critical infrastructure form a core element of safeguarding Finland's resilience to crises. In line with the concept for comprehensive security, the resilience of Finnish society is based on the ability to maintain the vital functions of society under all circumstances. Vital functions are essential for the functioning of society and they must be maintained in all situations.

The vital functions of society are secured by implementing strategic tasks that are based on legislation, confirmed by agreements and complemented by voluntary action. These tasks are secured through cooperation between authorities, businesses, civil society organisations and citizens. Vital functions include leadership, international and EU activities, defence capability, internal security, economy, infrastructure and security of supply, functional capacity of the population and services, and psychological resilience.

Figure 2. Functions vital to society

4.2 Priorities

The CER Act imposes obligations on critical entities and on supervisory authorities, ministries and the National Emergency Supply Agency that these organisations have not previously faced to the same extent or at the same level. This requires the establishment of common operating models, the provision of administrative support to entities of different sizes providing critical services, and active exchange of information between the entities. Finland's priorities for enhancing the resilience of critical entities respond to these needs.

Priority 1: Establishing processes and structures under the CER Act and consolidating national and international operating models. The starting point for ensuring the resilience of critical entities is that the processes related to the implementation of the CER Act are as functional, clear and understandable as possible for both critical entities and the central government administration. It is important, for example, that the submission and receipt of incident notifications are made as straightforward as possible and that the identification of critical entities is carried out across sectors according to consistent principles.

Priority 2: Supporting critical entities. The obligations imposed by the CER Act on critical entities, such as drawing up a risk assessment, implementing measures to ensure resilience and preparing a resilience plan, place many organisations in a new situation. This requires supporting entities in meeting their statutory obligations. Support provided to critical entities is discussed in more detail in Chapter 5.

Priority 3: Enhancing the exchange of information at national and international level. The CER Act is cross-administrative legislation covering several sectors of society. It imposes obligations on ministries, supervisory authorities and critical entities of different sizes operating across those sectors. Implementation of the Act must be consistent regardless of the sector, the supervisory authority or the size of the critical entity. For example, the criteria for identifying a critical entity or the measures required from a critical entity should not differ significantly. Active coordination and the exchange of information and best practices enhance the resilience of critical entities. Such cooperation takes place among critical entities, between critical entities and central government, and with international partners and at EU level. This also ensures equal treatment of entities and reduces administrative burden at all levels.

Vital functions, the essential services necessary for their maintenance, and critical infrastructure are all strongly interdependent. An incident affecting one essential service may cause incidents in other essential services in one or more sectors. Developing the resilience and preparedness of critical entities is therefore important for the entities themselves and for the continuity of services provided by other critical entities, which in turn supports the comprehensive security of society. Measures aligned with the priorities aim to mitigate risks arising from such interdependencies. Establishing and optimising processes under the CER Act, supporting critical entities and ensuring active exchange of information will enhance the resilience of critical entities and the networks they form.

The dependencies of critical entities are not necessarily confined within Finland's borders. Due to the cross-border and global nature of key components of societal functioning, such as the economy, supply chains and energy supply, a disruption to the provision of an essential service may have impacts at regional, European or even global level. The objectives and priorities for enhancing the resilience of critical entities therefore also promote regional and European security. Finland, for example, shares critical infrastructure with neighbouring countries, and cooperates with these and other EU Member States to ensure that resilience measures for cross-border infrastructure in the Baltic Sea and Nordic regions are coordinated and comparable.

4.3 Measures to enhance the resilience of critical infrastructure

More detailed measures are needed to advance the objectives and priorities set out above for strengthening the resilience of critical entities. The Ministry of the Interior, other ministries and supervisory authorities, in cooperation with the National Emergency Supply Agency, promote the measures related to the resilience of critical entities. Measures to enhance resilience include the following:

- analysing the strategies in order to identify related best practices in respect of the strategies
- exchanging information on best practices with regard to the identification of critical entities
- exchanging information and best practices on innovation, research and development relating to the resilience of critical entities
- where relevant, exchanging information on matters concerning the resilience of critical entities with relevant EU institutions, bodies, offices and agencies.

In addition, supervisory authorities together with the National Emergency Supply Agency provide support to critical entities to enable them to fulfil their statutory obligations. Such support may include guidance materials and methodologies, the organisation of exercises to test resilience, and advice and training.

Processes related to incident notifications will be developed in order to reduce the administrative burden on entities and to facilitate the submission of notifications. In addition, an electronic incident notification channel will be developed to enhance the resilience of critical entities. It will enable critical entities to fulfil their statutory obligations to notify incidents to the supervisory authority and the Government Situation Centre as simply as possible. The Ministry of the Interior is responsible for developing and maintaining the electronic incident notification channel.

Critical entities must also draw up and regularly update a risk assessment that takes into account all relevant risks that may lead to an incident, that is, an event significantly disrupting the provision of an essential service. When preparing the risk assessment, the critical entity must take into account the national risk assessment of critical infrastructure and the resilience of critical entities (the national CER risk assessment), which was approved by the Government on 15 January 2026.

The national CER risk assessment covers significant risks to essential services, cross-border dependencies and interdependencies between sectors. It includes both risks identified and assessed on a sector-specific basis and risks common to all sectors. The risk assessment determines the nature and extent of risks. It does this by identifying and analysing potential relevant threats, vulnerabilities and hazards that may lead to an incident, and by evaluating the potential loss or disruption of an essential service if such an incident occurs. The national risk assessment is used to identify critical entities and to inform the risk assessments they prepare. It must be updated at least every four years. The national CER risk assessment is not a public document.

Critical entities must also take appropriate and proportionate technical, security and organisational measures to ensure their resilience. In addition, they must draw up a plan describing measures to prevent incidents from occurring, to ensure the protection of premises and the infrastructure located therein, to respond to, resist and mitigate the consequences of incidents and disruptions, and to recover from incidents. The plan must also include a description of how to ensure employee security and raise awareness among relevant personnel, and an implementation timetable. In addition, the critical entity must designate a point of contact through which the flow of information related to incident notifications is organised.

5 Supporting critical entities

5.1 Measures to enhance cooperation between public and private entities

The majority of critical infrastructure is operated by business and industry. Businesses that are identified as critical entities and are therefore subject to obligations require sufficient support to comply with those obligations. Enhancing the resilience of critical entities requires close cooperation between the public and private sectors. The most significant national structure for preparedness cooperation between the public and private sectors is the security of supply organisation coordinated by the National Emergency Supply Agency. It comprises approximately 1,500 critical companies, public entities, authorities and organisations.

Protection of critical infrastructure is a key element of security of supply, for which the ministries are responsible in their respective sectors. The measures taken by the ministries and their subordinate agencies to promote security of supply also support the resilience of essential services and critical entities. Security of supply refers to securing economic activities and the production and availability of goods, materials and services, and critical infrastructure, that are essential for the livelihood and protection of the population, the country's economy, national defence and security in preparation for, and during, serious disruptions in normal conditions as well as emergency conditions.

In Finland, national legislation includes preparedness obligations that go beyond those laid down in the CER Directive. In implementing the CER Act, existing structures are utilised as far as possible alongside that legislation. These structures include sectoral inter-authority cooperation networks, and the sectors, pools and committees of the security of supply organisation. For example, they provide training, exercises and other measures to strengthen the resilience of CER-critical companies. They also promote information exchange and other forms of cooperation between authorities and the private sector. Through the security of supply organisation and other networks, companies receive information, guidance, tools and other materials supporting preparedness.

5.2 Measures to support small and medium-sized enterprises

This chapter describes the measures in place to help entities identified as critical comply with the obligations under the CER Act. It also covers measures supporting microenterprises and small and medium-sized enterprises as defined in Commission Recommendation 2003/361/EC.

The services provided by small and medium-sized entities may be vital for the functioning of society, but such entities may have limited resources and expertise to meet resilience-related obligations. As a rule, requirements are proportionate to the size and resources of the entity. At the same time, support measures are in place to ensure that smaller entities can meet the requirements at reasonable cost and with a manageable workload.

All critical entities are provided with guidance, templates and practical tools to support risk management and preparedness. Competence is also strengthened through training, workshops and advisory services. Small and medium-sized entities have the opportunity to participate in joint exercises and situational awareness cooperation. In addition, entities are supported in technical and organisational matters. Particular attention is paid to microenterprises, which have the most limited resources. Both supervision and support measures are designed to be scalable and proportionate to the entity's size, sector and risk profile.

Information on the protection of critical infrastructure is available on the Ministry of the Interior's website. It also provides a handbook for critical entities to support the application of the CER Act.

6 Policy framework for cooperation between authorities under the CER and NIS2 directives in cybersecurity matters

The application of the acts implementing the CER and NIS2 directives requires close cooperation between the authorities supervising the acts. The Cybersecurity Act and the CER Act are largely supervised by the same authorities in the same sectors. Coordinating cooperation is particularly important in situations where, following a significant incident, an entity is subject to simultaneous supervisory measures, and in exceptional situations where there is more than one competent supervisory authority. The national implementation of the CER Act must ensure that the competent and supervisory authorities, specified in the regulation on the resilience of critical entities and cybersecurity, work in close cooperation in a coordinated manner.

To ensure shared situation awareness, coordination of activities and coordinated action by the authorities, the key authorities regularly exchange information. Cooperation ensures a coordinated approach and consistent requirements for critical entities. The structures, responsibilities and procedures for cooperation are documented and regularly assessed as part of national preparedness and risk assessment.

Entities identified as critical under the CER Act also fall within the scope of application of the Cybersecurity Act on the basis of that identification. The supervisory authorities specified in the Cybersecurity Act and the CER Act must regularly exchange information on the identification of critical entities, risks, cyber threats and incidents. Authorities may also supervise entities at the request of another authority.

National cooperation is linked to EU-level structures. Authorities participate actively in the work of the NIS2 Cooperation Group and the Critical Entities Resilience Group (CERG) and ensure that agreed approaches are applied at national level.



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