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LIMITE

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'I' ITEM NOTE

From: Presidency/General Secretariat of the Council
To: Permanent Representatives Committee (Part 2)
Subject: Report from the Danish Presidency on the main achievements at EU level
in the field of critical entities resilience

Delegations will find in annex the Report from the Danish Presidency on the main achievements at EU level in the field of critical entities resilience.

COREPER is invited to take note of the report.

Danish Presidency of the Council of the European Union 2025

Presidency report on main achievements at EU level in the field of critical entities resilience

Developments in the Working Party on Civil Protection - Critical Entities Resilience (PROCIV CER)

The Working Party on Civil Protection – Critical Entities Resilience (PROCIV CER) operates as a sub-group under the Council’s Working Party on Civil Protection (PROCIV). Among other things, PROCIV CER was the lead Council preparatory body during negotiations of the Critical Entities Resilience (CER) Directive 2022/2557¹, which aims to strengthen the resilience of critical entities in a dynamic threat landscape. The steady increase in the political and strategic focus on the protection of critical infrastructure across Member States has gradually impacted the scope of the Working Party. This evolution was reflected in *inter alia* the decision of the Polish Presidency to task PROCIV CER with the cross-cutting responsibility for the Council’s follow-up on the EU Action Plan on Cable Security.

During the Danish Presidency, three meetings of PROCIV CER have been convened, with a cross-cutting focus on developments in the EU Action Plan on Cable Security, countering hybrid threats, including the potential threats posed by drones, and stress testing of critical infrastructure. Another theme has been the interplay between NATO’s 7 Baseline Requirements and the implementation of the CER Directive, as well as Ukraine’s approach to protecting and ensuring resilience of critical infrastructure. Furthermore, PROCIV CER has been continuously informed about the status of the transposition of the CER Directive. Moreover, PROCIV CER has been briefed on a number of key proposals of relevance to its work, including the proposed 2028-2034 Multiannual Financial Framework, as well as the Omnibus IV package, The EU Space Act, the Military Mobility Package and the Digital Omnibus Regulation Proposal. The mentioned proposals are examined in other working parties.

Developments on work with the EU Action Plan on Cable Security

It has been a priority for the Danish Presidency to advance the discussions on the protection of critical undersea infrastructure in the EU, including by facilitating regular updates from the Commission and the European External Action Service (EEAS) on the state of play of the Action Plan on Cable Security (the Action Plan). The Action Plan outlines a series of coordinated actions to counter threats and enhance the resilience of critical undersea infrastructure across four pillars: *prevention, detection, response and repair*, and *deterrence*.

As the work under the Action Plan is progressing across several Council Working Parties and an informal Expert Group, the aim of the Danish Presidency has been to maintain oversight, facilitate information-sharing and to ensure that PROCIV CER delegates are kept informed of the relevant developments across the various work strands. This includes the invitation of PROCIV CER delegates to part of the 26 November 2025 meeting of the Working Party on Maritime Issues – EU Maritime

¹ Directive (EU) 2022/2557 of the European Parliament and of the Council of 14 December 2022 on the resilience of critical entities and repealing Council Directive 2008/114/EC

Security Strategy (EUMSS) focusing on, among other things, managing threats from the Russian shadow fleet and protecting EU critical maritime infrastructure. Furthermore, the Danish presidency has sought to include perspectives from the private sector by inviting Europacable and the European Subsea Cables Association (ESCA) to meetings of PROCIV CER.

Prevention pillar

At the 4 December 2025 PROCIV CER meeting, the Commission informed the working party of a key deliverable under the EU Action Plan on Cable Security: A report on mapping, coordinated risk assessment and stress testing guidance of EU submarine data cable infrastructures, which was adopted on 23 October 2025. The report has been drafted and adopted by the Informal Expert Group on Secure and Resilient Submarine Cable Infrastructures, set up by the Commission to support the implementation of Recommendation (EU) 2024/779². The report delivers on two actions under the prevention pillar of the EU Action Plan on Cable Security: A mapping of existing and planned submarine data cable infrastructures between the Member States and other parts of the world; and a coordinated risk assessment identifying seven main risk scenarios that build on different threats, vulnerabilities and dependencies, as well as guidance to stress-test these risk scenarios. The report also provides a policy and market overview of EU submarine data cable infrastructures. Based on the findings of the report, the Informal Expert Group is expected to adopt a second report in Q1 of 2026, which is anticipated to deliver a *Cable Security Toolbox* of recommended mitigating measures, as well as identification of *Cable Projects of European Interest* (CPEIs).

In parallel, as part of the prevention pillar, the Commission has awarded EUR 186 million in grants to 25 cable projects, as result of the fourth Connecting Europe Facility (CEF Digital) call for proposals, including routes already identified in the report of the Expert Group. The funded cables integrate smart technologies, ready to provide monitoring data to the Regional Cables Hubs under the detection pillar.

Detection pillar

As set out under the detection pillar of the Action Plan, the Commission, together with the Member States, are working towards the establishment of a dedicated regional Integrated Surveillance Mechanism (ISM) with the aim to deploy Regional Cable Hubs, one per sea basin. The Commission launched a EUR 10 million Call in October to support the establishment of these Regional Cable Hubs and presented the objectives of this call at the meeting of 4 December 2025. A priority would be to set up such a Cable Hub in the Baltic Sea region as a test bed of the integrated surveillance mechanism approach, aiming to integrate all relevant data, services, networks and entities per sea basin.

On 15 September and 4 December 2025, Finland briefed PROCIV CER on the progress of the first regional ISM, since Finland is leading the establishment of this first regional ISM in the Baltic Sea as a pilot project. Furthermore, an Expert Group consisting of the Baltic Sea states of the EU has been

² Commission Recommendation (EU) 2024/779 of 26 February 2024 on Secure and Resilient Submarine Cable Infrastructures

set up by Finland during the Danish Presidency to support the development of the first regional ISM. The first in-person meeting was held on 11 and 12 November 2025 in Helsinki.

Response and repair pillar

Under the response and repair pillar, the Commission reported in PROCIV CER on progress made in relation to the work on a modular approach to strengthen EU repair capacity. This is expected to unfold into a CEF Digital call for proposal focusing firstly on a pilot for the Baltic basin, followed by a general call covering the other EU sea basins, in coordination with the Digital Europe Programme (DEP) call for Regional Cable Hubs. The discussions on repair capacities were complemented by perspectives from the private sector, represented by Europacable as well as ESCA, who were invited by the Danish Presidency. Both organizations presented the efforts by their industry members to enhance the security and resilience of subsea power and telecom cables, the challenges faced in improving Europe's repair capacity, and their views on the EU Action Plan on Cable Security.

Deterrence pillar

Under the deterrence pillar, the EEAS briefed PROCIV CER delegates on the external dimension of the EU Action Plan on Cable Security, including the adoption of the 19th package of sanctions against Russia on 23 October 2025, bringing the total number of listed vessels in the Russian shadow fleet to 557 vessels.³ The EEAS furthermore highlighted work in the Working Party on Public International Law (COJUR) on a Joint EU Declaration on strengthening the Law of the Sea in relation to the Russian shadow fleet and the protection of submarine cables and pipelines. Moreover, the EEAS informed that dialogues had been initiated with partner countries on the protection of maritime infrastructure, particularly in the Indo-Pacific region, as well as enhanced dialogues with NATO to strengthen the common situational and threat picture.

Hybrid threats in relation to critical infrastructure, including the potential threats posed by drones

For the Danish Presidency, it has been a priority to facilitate discussions on how to protect critical infrastructure against an increasingly broad and complex spectrum of threats.

In light of the shifting risk and threat landscape in the EU, the Presidency facilitated information to and exchanges of views between Member States on hybrid threats that cut across traditional sectoral boundaries and challenge existing preparedness and resilience measures and mechanisms.

During the PROCIV CER meeting on 13 October 2025, the Danish Presidency ensured a focus on hybrid threats in relation to critical infrastructure resilience, particularly on the potential threats posed by drones.

At the meeting, the Danish Presidency shared its national experiences with countering the increasing hybrid threat to critical infrastructure, including the potential threats posed by drones. The Commission informed of its policies and operational support to Member States under the framework of the 2023 Communication on countering threats posed by drones. Furthermore, Poland was invited

³ Council Regulation (EU) 2025/2033 of 23 October 2025 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine

by the Danish Presidency to present its national approach to protecting critical infrastructure against drones, including national law enforcement measures. Poland highlighted that drones can be used for reconnaissance and espionage as well as attacks on critical infrastructure, and that cooperation between authorities, private actors and civil society is key to protecting critical infrastructure from the increasing hybrid threat.

Stress tests of critical infrastructure

PROCIV CER has served as a platform for follow-up work to the Council Recommendation on a Union-wide coordinated approach to strengthen the resilience of critical infrastructure, adopted on 8 December 2022.⁴ To enhance preparedness, the recommendation invites Member States to conduct stress tests – among other actions – based on common principles and joint scenarios at the EU level. EU-wide voluntary stress tests were conducted in the energy sector in 2023. During the Hungarian Presidency of the Council in the first half of 2024, PROCIV CER delegates discussed potential future voluntary EU-level stress tests, including when they should take place and which sector(s) that should be tested. The Hungarian Presidency understood that the majority of the Member States were in favor of undertaking voluntary stress testing in new sectors (beyond energy) in due course, and if possible and appropriate, before the end of 2026. On this basis, discussions were revisited in PROCIV CER by Danish Presidency of the Council in 2025.

As an introduction to the subsequent deliberations between Member States, the Danish Civil Aviation and Railway Authority presented national experiences from the stress test conducted in the Danish transport sector in 2024, focusing on the methodology and lessons learned. The Member States' discussions on stress test were guided by questions issued by the Danish Presidency focusing on the potential interest from Member States in conducting further national, voluntary resilience stress tests, based on common principles developed by the Commission in consultation with Member States, as well as potential timing and relevant sectors. Member States were also invited to submit written comments to these questions.

The Danish Presidency concluded that there was a broad consensus among Member States to resume discussions at a later stage, also considering the timeline of identification of critical entities under the CER Directive.

The Danish Presidency would like to invite future presidencies to consider continuing the discussions on stress tests of critical infrastructure at an appropriate time.

⁴ Council Recommendation of 8 December 2022 on a Union-wide coordinated approach to strengthen the resilience of critical infrastructure, OJ C 20, 20.1.2023, p. 1–11.