



November 2025

## Law 5236/2025 – Resilience of Critical Entities - Transposition of Directive (EU) 2022/2557

Law 5236/2025 establishes a new national framework for the identification and regulation of “critical entities” in Greece, aiming to strengthen the resilience of essential infrastructure and services against natural, technological, and hybrid threats. It also transposes Directive (EU) 2022/2557 (“CER Directive”) and repeals Directive 2008/114/EC.

The main provisions of the new Law can be summarized as follows:

### Scope of application

- The Law applies to entities (public or private) operating in sectors such as:
  - energy,
  - transport,
  - banking,
  - financial market infrastructures,
  - health,
  - drinking water and wastewater,
  - digital infrastructure,
  - public administration,
  - space,
  - food (production/processing/distribution).
- The Law does not apply to matters governed by Law 5160/2024 (NIS 2 on cybersecurity). In addition, activities relating to national/public security, defense, and law enforcement are excluded, as well as cases where specific European Union acts impose equivalent requirements.

## Obligations of Critical Entities

### ➤ Entity-level risk assessment

Critical entities shall conduct a comprehensive risk assessment within 9 months of notification and, thereafter, at least every four years, addressing all natural and man-made threats, to ensure that risks capable of disrupting essential services are identified and mitigated.

### ➤ Resilience measures

Critical entities are required to establish and maintain appropriate technical, security, and organizational measures, documented in a resilience plan, to enhance the resilience and protection of their services.

### ➤ Appointment of Representative

Designation of a responsible representative for the management of resilience matters and communication with the authorities.

### ➤ Personnel Screening

The competent Police Directorate shall conduct reliability checks on all personnel with access to critical facilities.

### ➤ Incident Reporting

Mandatory notification of incidents affecting operational resilience to the competent authorities.

## Establishment of the General Secretariat for the Protection of Critical Entities (G.S.P.C.E)

- A General Secretariat for the Protection of Critical Entities (G.S.P.C.E) is established within the Ministry of Citizen Protection, which serves as the competent authority and single point of contact for implementing the new framework, and is responsible for supervising compliance and enforcing measures and sanctions.

## Critical Entities of Particular European Significance

- An entity shall be considered a Critical Entity of Particular European Significance provided that: (a) it has been designated as such by the G.SP.C.E; (b) it provides essential services in at least six (6) Member States; and (c) it has been notified of the above category. The G.S.P.C.E shall promptly notify the entity of the European Commission's decision and the resulting obligations.

## Penalties

- The G.S.P.C.E may impose penalties in the event of a breach of obligations, which depending on nature and severity of the breach are as follows:
  - Basic obligations/recognition as a critical entity: up to €1,000,000.
  - Risk management/infrastructure security: up to €10,000,000.
  - Notification/reporting obligations: up to €1,000,000.
  - Non-compliance with an EU notification/decision (of special European interest): up to €1,000,000.
  - Specific obligations (network/infrastructure security, information in crisis situations): up to €5,000,000.
  - General infringements or failure to cooperate/exchange information: up to €5,000,000.

## Completion deadlines

- **By 17 January 2026:** The General Secretariat for the Protection of Critical Entities (G.S.P.C.E) shall adopt the National Strategy to enhance the resilience of critical entities.
- **By 17 July 2026 :** The General Secretariat for the Protection of Critical Entities shall identify the critical entities for the sectors set out in the Law and maintain their official register.
  - Within one (1) month of the above identification, the entities shall be notified of their inclusion in the register and their related obligations.
  - Within nine (9) months from receiving the G.S.P.C.E's notification, the critical entities shall complete a risk assessment.

## Let's talk

For a more in-depth discussion on the above you may contact:



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