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MANAGEMENT BOARD DECISION

DECISION No MB/2025/14

OF THE MANAGEMENT BOARD OF THE EUROPEAN UNION AGENCY FOR CYBERSECURITY (ENISA)

of 23 September 2025,

on the opinion on functioning of the ENISA Management Board

THE MANAGEMENT BOARD OF ENISA

Having regard to

- Regulation (EU) 2019/881 of the European Parliament and of the Council of 17 April 2019 on ENISA (the European Union Agency for Cybersecurity) and on information and communications technology cybersecurity certification and repealing Regulation (EU) No 526/2013 (Cybersecurity Act)[1], in particular Articles 13-19 thereof;
- Cybersecurity Act, in particular Article 67 thereof.

Whereas

(1) The functioning of the ENISA Management Board is described in Articles 13-19 of the Cybersecurity Act;

(2) By 28 June 2024, and every five years thereafter, the Commission shall evaluate the impact, effectiveness and efficiency of ENISA and of its working practices, the possible need to modify ENISA's mandate and the financial implications of any such modification.

(3) By 28 June 2024, and every five years thereafter, the Commission shall transmit a report on the evaluation together with its conclusions to the European Parliament, to the Council and to the Management Board. The findings of that report shall be made public.

[1] *OJ L 151, 7.6.2019, p. 15–69.*

HAS DECIDED TO ADOPT THE FOLLOWING DECISION:

Article 1

The Management Board of ENISA has decided to issue the opinion on the functioning of the ENISA Management Board as outlined in Annex I. This opinion is issued upon request of the European Commission in the context of the evaluation of the Cybersecurity Act.

Done by written procedure on 23.09.2025.

On behalf of the Management Board,

[signed]

Mr Tomáš Minárik

Deputy Chair of the Management Board of ENISA

ANNEX I

ENISA Management Board Opinion

The forthcoming revision of the Cybersecurity Act (CSA) presents a key opportunity to position ENISA as a strategic enabler of Europe's cybersecurity. Since the adoption of the CSA, the Agency has been assigned an increasingly diverse set of responsibilities across multiple legislative acts, reflecting the central role of cybersecurity in the Union's policy agenda. This expansion, while valuable, has also created a fragmented mandate that risks ENISA's ability to deliver maximum impact.

A coherent and future-oriented framework is therefore required — one that consolidates the various tasks entrusted to ENISA, clarifies its role across the EU cybersecurity landscape, and empowers it to act as a unifying body for cybersecurity expertise, capacity building, and trust. Realising this vision depends on providing ENISA with sufficient resources, both financial and human, to match its expanding responsibilities and ensure that its work is sustainable, effective, and strategically aligned with Europe's long-term cybersecurity posture.

The Management Board (hereafter MB) welcomes the European Commission's strong commitment to ENISA, expressed through the assignment of new and enhanced tasks. At the same time, the MB urges the European Commission to address the widening gap between available resources and heightened expectations before assigning further responsibilities to the Agency in a revised CSA.

The MB further advises the Commission to systematically draw upon ENISA's cybersecurity expertise during the preparation and development of all cyber related legal acts, in recognition of the horizontal nature of cybersecurity across policy domains.

The MB issues the below opinion, which was requested by the European Commission during the ENISA MB meeting on 17-18 June 2025, based on results of a MB survey, which ran in the timeframe 7 July – 31 July 2025.

The results of the survey were discussed by the Executive Board during its meetings on 17-18 July 2025 and 20 August 2025. While generally satisfied with the Board's work and procedures, the MB proposes the amendments as set out below to provisions outlined in Art. 13-19, CSA. The main issue identified was a clear strategic focus for the MB.

The following section presents a sample of responses received through the survey. They reflect MB perspectives and should not be construed as representative of the majority view on the matters addressed. The MB opinion is without prejudice to the individual positions of the Member States.

1. The MB evaluates the **structure of ENISA as outlined in Art. 13**, CSA as overall **effective (1 highly effective, 14 effective, 3 moderately effective)**. The following recommendations and comments are highlighted:
    a) Links/relations and accountabilities between the bodies should be clearer:
        i. Focus of MB on strategic discussions, Executive Board for preparatory, administrative and implementing issues
        ii. Alignment, coordination and collaboration between the MB and NLO Network (NLO NW)

        iii. Clarify the role, responsibilities, value & output of NLO NW & Advisory Group (see points 8 and 9)
    b) Avoid overlaps with other cybersecurity structures, organisations and formal groups (e.g. ECCC, NIS Cooperation Group), in particular those, which have been established after entry into force of the CSA in 2019.
    c) Consider an ENISA stakeholder group for opinions from e.g. EU agencies.

2. The MB evaluates the **composition of the MB (Art. 14, CSA)** as overall **effective (4 highly effective, 14 effective, 1 moderately effective)**. The following recommendations and comments are highlighted by MB members:
    a) Consider the option of **two alternates**, where one of the alternates doubles as the NLO. MB members and alternates should continue to be able to be accompanied by experts as observers, as currently foreseen in Art. 17(5), CSA.
    b) Maintain a clear **focus and priority on strategic direction & priority setting for ENISA.**
    c) Member State (MS) representatives in the MB should include representatives of national **competent authorities responsible for cybersecurity** given the matters being discussed.
    d) Consider adding wording in Art. 14 (or Art 17) allowing for representatives from EU institutions, bodies, agencies (e.g. ECCC Executive Director and/or chair of the ECCC Governing Board, Horizontal Working Party on Cyber Issues & NIS Cooperation Group chairs), other organisations or third countries to participate as **observers** upon invitation by the MB.
    e) Consider measures to enforce the mission to achieve **gender balance** stated in Art 14.

3. The MB evaluates the **functioning of the MB (Art. 15, CSA)** as overall **effective (1 highly effective, 13 effective, 4 moderately effective)**. The following recommendations and comments are highlighted:
    a) The MB emphasises that the MB is the responsible body for tasking ENISA.
    b) Meetings should leverage strategic decision makers to identify challenges and how ENISA can support MS in solving them.
    c) The Single Programming Document is of crucial importance, because it outlines ENISA's annual and multi-annual tasks. The MB should play a **bigger role in the drafting process**, instead of only approving it. That will raise the involvement of MS, resulting in a closer cooperation between the MS, ENISA and the European Commission. This could be achieved by organizing an additional session once a year, wherein this document is thoroughly reviewed with the participants.
    d) The MB should be able to establish **additional volunteer subgroups** to undertake specific tasks. One such subgroup may be constituted to develop the Single Programming Document, with the mandate to enhance MS' engagement, facilitate substantive discussions, and ensure the document accurately reflects their positions.
    e) ENISA should **update MB members and NLOs (see also point 8) more frequently on the progress of activities** being carried out and on budgetary aspects, in accordance with the SPD, and on new developments that emerge from time to time (e.g. using a single dashboard), as well as duly inform and allow for discussion of future activities well in advance before they are put forward for adoption. This would also allow for better national coordination with the NLOs, to the benefit of the Board.

4. The MB assesses that the **provisions on the Chairperson of the MB (Art. 16, CSA)** overall **enable the Chairperson to implement the tasks assigned to that function (11 yes, 1 no, 3 somewhat)**. The following recommendations and comments are highlighted:

   a) Underline gender balance (e.g. “The Management Board shall elect a Chairperson and a Deputy Chairperson from among the members with voting rights, by a majority of two thirds of the members, and shall strive for gender balance.”)

5. The MB evaluates the **functioning of the meetings of the MB (Art. 17, CSA)** as overall **effective (1 highly effective, 13 effective, 4 moderately effective)**. The following recommendations and comments are highlighted:
   a) The frequency, format and conduct of MB meetings shall not be further prescribed by law, in order to preserve the Board’s procedural flexibility.

6. The MB assesses that the **provisions on voting rules of the MB (Art. 18, CSA)** are **effective and inclusive (18 yes, 1 somewhat)**. The following recommendations and comments are highlighted:
   a) The revised Regulation shall include explicit provisions enabling online voting, specifying permitted types of electronic voting tools, requirements for pre-vote testing or dry-runs, and provisions for observer access and oversight of the electronic voting process.

7. The MB assesses that the **MB members’ and alternates’ profiles and expertise** are overall **adequate** with regards to the tasks required (e.g. budget, work programme development) and their ability to address ENISA’s strategic objectives as well as assessing and supervising the work programme implementation (3 highly adequate, 13 adequate, 1 moderately adequate). The following recommendations and comments are highlighted:
   a) Profiles and expertise of members and alternates should remain diverse.
   b) The composition of the MB shall ensure the inclusion of experienced strategic decision-makers who possess practical experience in managing their respective agencies and overseeing agency budgets.
   c) Offer access for Executive Board/MB to independent legal and financial services for consultation.

8. **MB recommendations** to further develop the **cooperation between the ENISA MB and the NLO Network** are as follows:
   a) The legal basis for the NLO Network in the CSA is welcomed.
   b) Role of the NLO Network should be clarified, specifically in regard to the cooperation with the MB.
   c) Increased cooperation, alignment and engagement between NLO Network and MB is desirable. In particular, the role of the NLO Network in the implementation and drafting of the Single Programming Document should be enhanced (see also point 3 c, d, e).
   d) Avoid duplication: NLO Network, NIS Cooperation Group and other platforms on information sharing have similar objectives.
   e) NLO Network could be rethought and adapted to potential additional tasks of ENISA under new legislation.

9. **MB recommendations** to further develop the **cooperation between the ENISA MB and the ENISA Advisory Group** are as follows:
   a) Invite Advisory Group to MB meetings at least once per year.
   b) Regular updates and possibility of joint meetings between MB and Advisory Group should be kept for the purpose of strategic exchange.
   c) There should be the possibility for consultation of the Advisory Group for certain topics identified by the MB.

   d) ENISA should present how the Advisory Group's opinions were reflected or addressed in MB meetings.
   e) Invite the Advisory Group to produce regular advisory reports summarizing key insights, challenges encountered, and recommendations for opportunities to be leveraged.

10. **MB recommendations** on the **functioning of or provisions on the Executive Board** (Art. 19, CSA) are as follows:
    a) Both MB members and their alternates shall be eligible for election to the Executive Board, thereby broadening representation from MS; accordingly, both members and alternates may stand for election as Executive Board members at MB meetings. (See point 7 on profiles)
    b) The Executive Board shall help steer the MB into strategic discussions and prepare the MB meetings as currently foreseen in the CSA.
    c) The MB Deputy Chairperson should automatically be a member of the Executive Board.

11. **Further recommendations**:
    a) The Regulation shall provide for the establishment of an official Deputy to the ENISA Executive Director, who shall be elected by the MB.