

Translation: Only the Danish document has legal validity.

*Executive Order no. 655 of 11/06/2025
issued by the Danish Maritime Authority*

Executive Order on cybersecurity on ships subject to ISM and other ships

Pursuant to section 3(1)(2) and (5), section 6, section 17a(2) and section 32(10) of the Act on Safety at Sea, cf. Consolidated Act no. 221 of 11 February 2022, as amended by Act no. 1773 of 28 December 2023, is laid down in accordance with the authorisation pursuant to section 1(1)(3) of Executive Order no. 261 of 23 March 2020 on the delegation of certain powers to the Danish Maritime Authority and on the right of appeal, etc:

Section 1. Shipping companies subject to ISM obligations shall, in connection with the development, implementation and maintenance of a safety management system (SMS), take appropriate and proportionate technical, operational and organisational measures to manage cybersecurity risks relevant to the safety of ships in accordance with the requirements of Regulation (EC) No. 336/2006 of the European Parliament and of the Council of 15 February 2006 on the implementation of the International Code for the Safe Operation of Ships in the Community and repealing Council Regulation (EC) No. 3051/95 (ISM Regulation) and the International Maritime Organisation's Guidelines on Maritime Risk Management (MSC-FAL. 1/Circ. 3/Rev. 3).¹⁾

Section 2. The Danish Maritime Authority may issue orders to shipping companies of ships not covered by section 1 to implement measures as mentioned in section 1 when justified in the interests of the safety of ships and their navigation.

Subsection 2. When issuing an order under subsection 1, the Danish Maritime Authority may, based on an assessment of the ship's use and size, determine the detailed requirements for documentation to implement the measures.

Section 3. Shipping companies of ships covered by section 1 shall, without undue delay, report to the Danish Maritime Authority and the CSIRT incidents concerning cybersecurity that have significant consequences for the safety of ships and their navigation.

Subsection 2. For shipping companies for ships covered by section 2, the Danish Maritime Authority may decide that the reporting obligation in subsection 1 applies.

Subsection 3. Reporting of incidents covered by subsection 1 must be done digitally via the self-service solution at virk.dk.

Section 4. Violation of Sections 1 and 3 is punishable by a fine.

Subsection 2. Criminal liability may be imposed on companies, etc., (legal persons) in accordance with the rules in Chapter 5 of the Danish Criminal Code.

Section 5. The Executive Order entered into force on 1 July 2025.

Subsection 2. Executive Order no. 46 of 15 January 2019 on security in network and information systems of importance to the safety of ships and their navigation is repealed.

Section 6. The Order shall not apply to Greenland.

The Danish Maritime Authority, 11 June 2025
Malene Loftager Mundt

/ Mikkel Brandenburg Stenalt

Official notes

Endnotes

¹⁾ Reference is also made to the requirements of Article 3(5) on minimum standards for ship security assessments in Regulation 725/2004/EC of the European Parliament and of the Council of 31 March 2004 on enhancing ship and port facility security.