FERMA
Anticipating changes
Shaping the future

FERMA'S CONTRIBUTION TO THE DANISH PRESIDENCY AGENDA

JULY 2025

"Det er vanskeligt at spå – især om fremtiden"

Robert Storm Petersen

Key Points

FERMA calls on the Danish Presidency of the Council of the European Union (EU) to recognise the contribution of risk management to building a more prepared, more resilient and more competitive EU.

FERMA embraces the Presidency's objective to implement the EU's Preparedness Union Strategy. Mapping risks and threats, raising awareness to implement prevention and mitigation measures in a targeted manner is at the very heart of the risk managers profession. This should also be an opportunity to address the pressing issue of climate and cyber insurance protection gaps.

We appreciate the Presidency's emphasis on simplification and burden reduction, especially regarding sustainability and cyber resilience.

- FERMA is supportive of the Presidency's will to reconcile climate objectives with simpler and more workable rules when it comes to sustainability reporting and due diligence. The implementation of proper risk management methodologies and of a thorough risk-based approach will be key in this regard.

- Strengthening the EU's cyber resilience is crucial in the face of growing cyber risks and hybrid threats. FERMA believes that it can be achieved through streamlining cyber reporting requirements.

FERMA
Anticipating changes
Shaping the future

Background

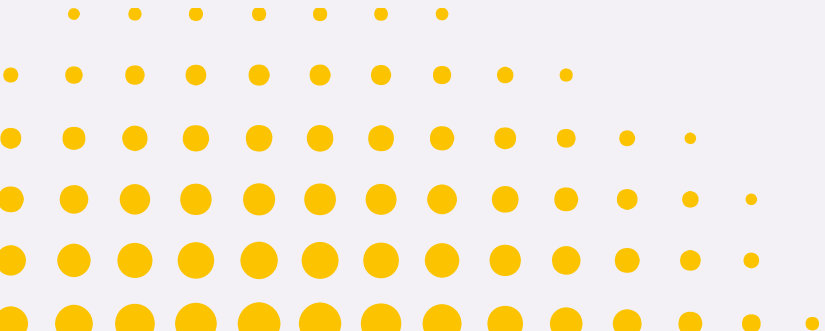
Denmark will chair the Council of the European Union for 6 months, from July to December 2025. The Danish Presidency is taking place at a decisive moment, as the EU is facing pressing challenges, from advancing the climate transition while improving its competitiveness, to ensuring its security in several areas (defence, economics, etc.) while delivering on the simplification agenda. In order to address these issues, the Presidency will deal with ambitious initiatives, such as the first Omnibus package on simplifying sustainability reporting, the European Union Preparedness Strategy or the digital agenda.

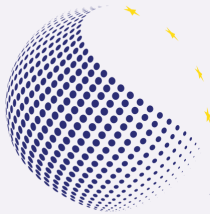
The Presidency's work programme follows a clear philosophy, spelled in its motto: "A strong Europe in a changing world". FERMA's ambition of "Making Europe risk-ready for a brighter future", as highlighted in our manifesto, is very much aligned with this objective.

Risk managers' expertise is key to understand and mitigate the various risks that Europe is facing in order to strengthen its competitiveness and resilience, while safekeeping its values and raison d'être.

Therefore, FERMA has identified two key policy areas where risk managers can contribute to the Danish Presidency's priorities:

i. Crisis preparedness and resilience.
ii. Simplification and burden reduction with a focus on sustainability and cyber security.





FERMA
Anticipating changes
Shaping the future

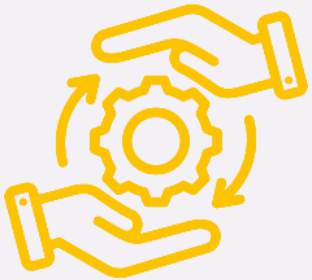
Strengthening crisis preparedness and resilience

"The EU must be able to handle current and future crises and disasters, given the changing threat landscape." (Danish Presidency)

Better integrate risk management in decision-making processes

FERMA strongly agrees with the ambition of the Danish presidency to implement the **EU's Preparedness Union Strategy**, following the recommendations in the Niinistö report to strengthen the Europe's civilian and military preparedness and readiness. While initiatives exist, the EU can and should go further. To truly enhance its geopolitical resilience, the **EU must prioritise risk management across all levels** – from fostering cross-sectoral and cross-border cooperation to establishing robust crisis preparedness and response tools.

By implementing a holistic risk management strategy, the EU can navigate the complexities of the current geopolitical environment and ensure long-term security and prosperity. In this regard, FERMA supports the **creation of a permanent function of Risk Manager within the European Commission**, with a Commission Executive-Vice-President responsible for Risk Management. Risk Managers stand ready to share their expertise in crisis management, preparedness and business continuity for a safer and more competitive EU.



FERMA
Anticipating changes
Shaping the future

Strengthening crisis preparedness and resilience

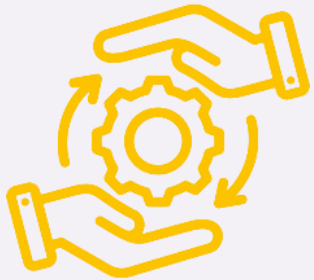
Enhancing risk awareness and minding protection gaps

More concretely, FERMA stresses the need to follow risk managers' expertise when elaborating a **public-private preparedness task force** and increasing awareness about risks and threats for civilians .

The Niinistö report on civilian and military preparedness states that "*the private sector's preparedness and resilience is vital to ensuring critical functions for societies and the EU as a whole*", an observation that FERMA shares wholeheartedly. Risk managers first in line within their organisation to assess and address the risks posed by natural catastrophes, geopolitical instability or even hybrid threats, in order to ensure business continuity – especially in strategic and dual-use industries.

A concrete way to bridge the gap will be to offer a **Europe-wide offer of risk management training for public and private organisations**, using the rimap© certification as inspiration.

The Preparedness Union Strategy also mentions the drafting of a **Climate Adaptation Plan**. As climate change adaptation and natural disasters are the most worrying risks according to risk managers in the long term. In this regard, **53% of Risk Managers deem that some risks (73% of them mentioning natural catastrophes) will become uninsurable in the future**. Therefore, in order toto address the climate protection gap**, FERMA supports the ECB/EIOPA proposal to create an EU public private reinsurance scheme** in order to pool a wide range of risks through a risk-based pricing approach.



FERMA
Anticipating changes
Shaping the future

Simplification and burden reduction to achieve a sustainable and cyber resilient EU

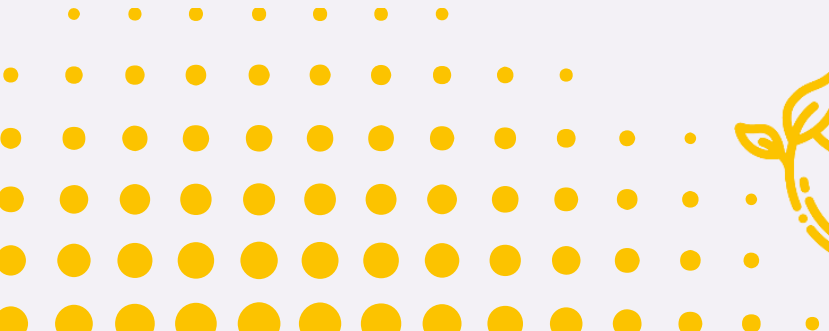
"To strengthen EU competitiveness, the simplification and burden reduction agenda will be a central priority during the Danish Presidency"
(Danish Presidency)

FERMA agrees that restoring **EU competitiveness through regulatory simplification** must be a central focus. In this regard, we welcome the Presidency's commitment to reducing unnecessary and cumbersome requirements and want to bring to its attention potential avenue for **simplification in sustainability and cyber reporting**.

Sustainability related dossiers

FERMA welcomes the ambition of the Danish Presidency to focus on the **first Omnibus package** while maintaining the EU's commitment to the green transition. FERMA strongly calls co-legislators to **establish a clear reference to the Enterprise Risk Management (ERM) methodology**, driven by the risk function,

to apply when conducting the double-materiality assessment under the CSRD while making sure that the upcoming voluntary reporting standards for companies that are now out of scope of the CSRD result in **effective sustainability risk management practices**. FERMA is also supportive of **reporting proportionality** through a VSME stage (up to 500 employees), a stage with lightened ESRS and a simplified audit (from 500 to 1000 employees) and "full ESRS" (more than 1000 employees). On the CSDDD, FERMA recalls the need to implement a **risk-based approach based on approved risk management processes** when conducting the due diligence at the first level of suppliers ("tier 1"). In addition, it is paramount to implement a **harmonized framework to avoid single market fragmentation**, notably when it comes to the civil liability provisions.



FERMA
Anticipating changes
Shaping the future

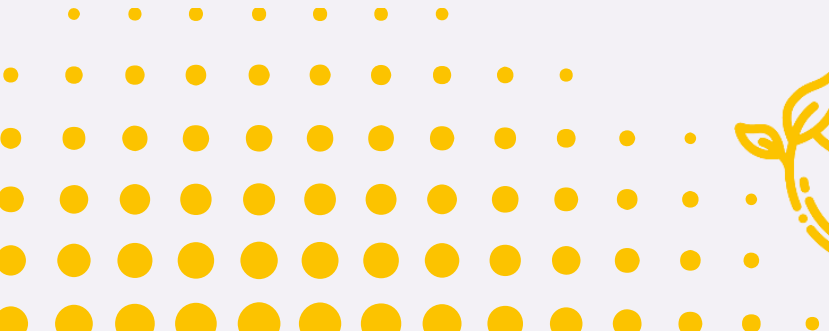
Simplification and burden reduction to achieve a sustainable and cyber resilient EU

Cyber related dossiers

Moreover, FERMA supports the fact that "*the Presidency will work towards a thorough and effective implementation, and streamlining, of the recently adopted cybersecurity legislation*" . Indeed, over the course of the last five years, the digital threat landscape has been dramatically altered by the Pandemic, the rise of remote working, wars and conflict, as well as the rapid developments of Artificial Intelligence (AI). **Risk Managers assess that cyber risks as the most critical threat since 2020**. The EU has been very active on this front, notably with the adoption of the Cyber Resilience Act, NIS2, the AI Act and DORA (amongst others).

Nevertheless, **this proactiveness has led to unintended consequences** with overlapping and sometimes contradicting requirements in case of cyberattacks.

Therefore, FERMA urges **to streamline cyber reporting requirements** through the creation of a **"single point of entry" for cyber incident notification** as well as providing EU Member States guidance on how to streamline processes and the number of entities involved. The **revision of the Cybersecurity Act (CSA)** which is expected to be presented as a part of the digital package will also be an opportunity to address this issue.



FERMA
Anticipating changes
Shaping the future

Contact Us

Charlotte Hedemark
President, FERMA
Charlotte.hedemark@ferma.eu

Adrien Boudet
EU Affairs Manager, FERMA
Adrien.Boudet@ferma.eu

www.ferma.eu

+32 (0)2 761 94 32

Avenue de Tervuren 273 B12
1150 Brussels, BELGIUM

FERMA
Anticipating changes
Shaping the future