Cybersecurity Act 2 Simulation: Role Handout

The Pirate Academy was made possible by the Greens/EFA group in the European Parliament.

Council: Finland

Confidential: for the assigned participant only. Do not share with other participants, including members of your own team. Positions in this scenario are fictionalised for educational purposes and inspired by, but not identical to, publicly reported positions. Roles are institutional functions, never named living individuals.

Your team in this scenario

Five or six member states sit in the Council: Ireland (presidency), France, Germany, Finland and Czechia, plus Poland if cast (the facilitator will say who is present). Each state has one vote. A text is adopted if **no more than one member state present votes against** (4 of 5, 5 of 6 with Poland, or 3 of 4 with a reduced cast), so two states together can block. If the Commission opposes the final text, the Council must be unanimous. The presidency chairs the Council and speaks for it in the trilogue. Your team shares three public goals, listed below and in the general factsheet. If no act is adopted, your team scores -5. The rules in full are in the general factsheet.

Your position in November 2026

Finland has a 1,340 km border with Russia. Since joining NATO in 2023, you have lived with sabotage and hybrid attacks: on 25 December 2024 a tanker damaged the Estlink 2 power cable and several data cables in the Gulf of Finland, and the Finnish authorities seized the ship. For you, supply chain security is not theory.

You want strong, fast rules and you are not afraid of naming the problem. You also have an interest you do not advertise: Finland's Nokia is one of the two European suppliers that would replace Chinese equipment.

Your own Council team wants long deadlines and low costs. You will have to decide how far to break with it.

Your team's public goals

Every player of your team shares these goals. Everyone in the room knows them.

1. **Keep the costs down (Articles 7 and 10).** 1 point if the phase-out period for most equipment is at least 36 months. 1 point if the maximum penalty is below 7% of turnover.

2. **A proportionate scope (Article 3).** 2 points if Annex I is limited to energy, drinking water, health and electronic communications networks, or fewer. 1 point for a middle solution: those core sectors plus up to three others, or a broader list where the phase-out applies only to the core sectors or only above a size threshold.

3. **Member states stay in control (Articles 6 and 8).** 1 point if designation requires the agreement of the member states (a Council or committee vote) before it takes final effect; a provisional designation that the member states must confirm counts. 1 point if member states may keep their own certification on national security grounds.

Confidential (for you alone): your secret goals

Never show this part before the reveal. You may lie about it. Each goal scores all or nothing. Goals that test the text score only if an act is adopted, unless the goal says otherwise.

Name the risk (1 point)

The final text names Russia or China as a source of risk (in a recital or an article).

Jurisdiction matters (2 points)

Ground (a) of Article 6 (country of jurisdiction) is kept as a ground that can justify a designation on its own.

Fast and firm (3 points)

Article 7 sets a single phase-out period of at most 18 months for all designated technology (a tiered period with a longer tier for "most equipment" does not count), **and** the text contains a provisional designation that takes effect before the member states are consulted or confirm it. Your own Council team wants 36 months. You may work with the security-minded members of the Parliament.

Who you need and who is in your way

- **The EPP and the rapporteur** share your security line.
- **The Commission's Director-General** wants a strong designation power.
- **In your way:** Germany and France on speed; Germany and the Patriots on naming countries; Ireland and the Commission's Legal Service (if cast) on ground (a).

What you can give away

- the breadth of the scope beyond the core sectors;
- the level of penalties;
- procedural rights for vendors.

If there is no deal

If no act is adopted, your team scores -5, and Europe stays without common rules. For you that is a security risk, not just a lost file.

Scorecard: Finland

At the reveal, hand this page to your verifier (a player from another team). The verifier checks each secret goal against the final text, the inject log, the vote record and the reputation results, and marks it. You may contest one item; the lead facilitator rules on disputes.

Secret goal	**Scores if**	**Points**	**Verified**
Name the risk	Russia or China named	1	
Jurisdiction matters	ground (a) kept as a stand-alone ground	2	
Fast and firm	a single period of at most 18 months, and a provisional designation effective before member-state	3	

Secret goal	Scores if	Points	Verified
	consultation or confirmation		
Secret goals total		0 to 6	

Personal score	Points
Team score (lead facilitator; -5 if no act)	
Secret goals (verifier)	
Reputation (second facilitator; -2 to 2)	
Total	