

NIS2 and ReCyF

Ask the right questions

For a director, IT manager or security contact assessing an entity in France. Separate scope questions, customer requests and controls actually demonstrated. ANSSI and ReCyF are French references; check local rules elsewhere.

The short answer

Check activity, size, relationships with other enterprises and exceptions. Use ANSSI guidance. A customer questionnaire or a security control cannot establish your regulatory status.

Three fictional cases, three next checks

Situation	What to verify next
18 staff; major customer questionnaire	Describe the activity and requested clause. Assess the entity separately. The questionnaire alone determines nothing.
12 staff; DNS services for customers	Identify the exact service and examine exceptions. Small staff numbers do not exclude every situation.
30-person subsidiary	Obtain ownership relationships and relevant group data before reaching a conclusion about size.

Exercise: identify the shortcuts

"We have fewer than 50 employees and our provider installed a firewall. Therefore, we are outside scope." What information is missing? Does the firewall change legal status?

Worked answer

Activity, financial criteria, linked enterprises and exceptions are missing. The firewall is a technical control. The conclusion is "status requires assessment", with a list of documents to obtain, not a legal verdict.

On 29 September 2026, ANSSI still presents ReCyF as a working document, non-mandatory by default. It organises preparation; it is not certification. Check official publications before a regulatory decision.

A backup exists. What has actually been proved?

Useful evidence describes scope, date, test, result and limits. This example is entirely fictional:

Field	Completed control record
Service and objective	Quotation management. Internal target: recover within 4 h; lose at most 24 h of data.
Test	On 25 September, restore the 24 September, 22:00 backup in an isolated environment.
Result	1 h 20 to restore, then 20 min to open and edit a test quotation. Total: 1 h 40.
Limits	Email not tested; whole-site outage not simulated. Simulated incident time still needs recording.
Next action and evidence	Assigned operator: test mail relay by 2 October. Keep report, backup reference and business acceptance.

What this record supports

The tested scope was restored in 1 h 40. Complete recovery within 4 h is not yet demonstrated. To assess data loss, compare the recoverable point with the simulated incident time and check consistency.

Exercise: one MFA exception

The objective covers ten administrator accounts. Nine have multi-factor authentication; one uses a legacy application. The table says "MFA enabled: yes". Is that an accurate description?

Worked answer

Write "9/10 covered; one account under exception". Record risk, compensating restrictions, owner and review date. Assess the compensating control; do not automatically treat it as equivalent to MFA.

Share appropriate evidence

For a customer, specify service, control, date, result and limits. Offer evidence through an agreed channel. Check need and authorised recipients before sharing secrets, detailed infrastructure maps or personal data.

03 / COMPLETE AND KEEP

Two starting worksheets

1. Scope to assess

Information	Your situation / document to obtain
Entity and activity	Name / country / exact service: _____
Size and relationships	Staff / turnover excl. VAT / balance sheet / year: _____ Linked or partner enterprises: _____
Dated assessment	Sector / exception / official source: _____ Guidance / assumption / uncertainty: _____
Confirmation	Owner / next verification / date: _____

2. Control to demonstrate

Information	Your result
Service and objective	Scope / owner / internal objective: _____
Test and evidence	Date / method / result / supporting record: _____
Limits and next action	Exception / action / owner / deadline: _____

Example internal plan over one month

W1: assess scope. W2: describe one critical service and its access. W3: test recovery and sensitive access. W4: exercise an incident and decide corrections. This is not a legal deadline or a promise of compliance.

Official sources

[ANSSI: initial NIS2 scope guidance for France](#)

[ANSSI: ReCyF status and current reference](#)

[EU Directive 2022/2555: scope, governance and reporting](#)

ANSSI status checked on 29 September 2026. This workbook supports a first workshop; it is not an exhaustive compliance checklist. French regulatory context; no real test results are claimed.