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COVER NOTE

From:	European Economic and Social Committee
date of receipt:	8 December 2025
To:	General Secretariat of the Council
Subject:	REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the safety, resilience and sustainability of space activities in the Union - <i>Opinion of the Economic and Social Committee</i>

Delegations will find attached the opinion adopted by the European Economic and Social Committee on the above proposal.

Other language versions, if needed, will soon be available on the following website: [DM Search v4.6.0 \(europa.eu\)](#).



OPINION

European Economic and Social Committee

EU Space Act

Proposal for a Regulation of the European Parliament and of the Council on the safety,
resilience and sustainability of space activities in the Union
(COM(2025) 335 final - 2025/0335 (COD))

TEN/835

Rapporteur: **Angelo PAGLIARA**

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EN

Advisor	Sergio MARCHISIO (to the rapporteur)
Legislative procedure Referral	EU Law Tracker European Parliament, 8/9/2025; Council of the European Union, 30/9/2025
Legal basis	Articles 114 and 304 of the Treaty on the Functioning of the European Union
European Commission documents	COM(2025) 335 final Summary of COM(2025) 335 final
Relevant Sustainable Development Goals (SDGs)	SDG 8 – Decent Work and Economic Growth SDG 9 – Industry, Innovation and Infrastructure
Section responsible	Transport, Energy, Infrastructure and the Information Society
Adopted in section	12/11/2025
Adopted at plenary session	4/12/2025
Plenary session No	601
Outcome of vote (for/against/abstentions)	195/2/5

1. RECOMMENDATIONS

The European Economic and Social Committee (EESC):

- 1.1 endorses the objectives of the proposed Space Act. At the same time, it recommends structurally and immediately strengthening European public investment in space and increasing space investment to at least 0.2% of GDP by 2030, gradually closing the gap with the US and China in line with the goal set out in the regulation of making the EU a world leader in the space sector;
- 1.2 highlights that the regulation identifies the need for a clear regulatory framework to attract private investment, and calls for this to be accompanied by an industrial and technological strategy that maximises the economic and social return for Europeans, defines tools to reduce dependency on critical supplies from outside Europe and supports the development of European launch capabilities;
- 1.3 recommends providing a more detailed explanation of how Article 114 of the Treaty can serve as the legal basis for establishing and operating the internal market for space-related products, services and data. At the same time, it advises that care be taken to ensure consistency and uniformity in the terminology used throughout the regulation. Furthermore and with a view to guaranteeing regulatory consistency, it suggests introducing a clause stipulating that the provisions of the Space Act must be interpreted in light of the international obligations already accepted by the Member States in relation to space activities;
- 1.4 recommends clarifying the reasons why Title I refers solely to the criterion of Member State of establishment of the operator or third-country space operator, without making any reference to the State of nationality of such operators (see, for example, Article 1(2)(a) and definitions (17) and (19) under Article 5). Furthermore, it recommends clarifying Article 6(3) in order to ensure better coordination with the national space legislations of the Member States that identify operators required to obtain authorisation for space activities on the basis of nationality or the territory from which the space activity is conducted;
- 1.5 recommends clarifying, in Title II, the functioning of derogations and flexibility in the authorisation process, specifying processing times, applicability to non-commercial missions, Commission inspection powers and the operational role of the European Space Agency (ESA) and the European Union Agency for the Space Programme (EUSPA);
- 1.6 suggests specifying in the regulation that the URSO (Union Register of Space Objects) is an internal EU instrument for registering authorised operators, thus standardising terminology and avoiding duplications with national or international registers;
- 1.7 recommends defining precisely the limits within which Member States can impose stricter requirements with regard both to the free movement of space-based data and space services in the Union, for reasons of safety, resilience and environmental sustainability, and to the authorisations granted by other Member States, in order to prevent any distortion of the internal market;

- 1.8 highlights the need to strengthen the principle of mutual recognition and common rules to avoid fragmentation and bureaucratic obstacles, creating a harmonised framework at EU level that supports operators and Member States in achieving the objectives of the Space Act. In this context, suggests exploring the setting up, in coordination with EUSPA, of a European ‘one-stop shop’¹ for authorisations and registrations that can streamline procedures and at the same time ensure compliance with the safety, resilience and sustainability standards laid down in the regulation (Articles 8, 10, 19, 62 and 69);
- 1.9 recommends ensuring that the implementing and delegated acts are drawn up with the structured involvement of the Member States, stakeholders and social partners;
- 1.10 recommends clarifying that the regulation should avoid any overlaps with existing EU instruments on cybersecurity and critical infrastructure (NIS 2 Directive, CER Directive, Cyber Resilience Act);
- 1.11 recommends defining in Title III and specifically with regard to Article 16, transparent and verifiable criteria for the recognition of equivalent regulatory regimes of third countries, including mechanisms for regular monitoring and review. At the same time, asks for clarification as regards how the EU can require third country operators to comply with standards, by defining inspection powers, conditions for cooperation agreements with non-EU authorities and effective enforcement mechanisms;
- 1.12 recommends ensuring that the implementation of the binding system for the calculation and certification of the environmental footprint of space missions be based on proportionality criteria, safeguarding the sector’s competitiveness, while advancing where possible circular economy solutions;
- 1.13 recommends enhancing the role of European SMEs and start-ups in the space economy by providing tailored measures and facilitated access to European funds, subject to specific social sustainability criteria;
- 1.14 recommends linking the European Space Strategy to European strategic autonomy and encouraging the activation of complementary ecosystems and the multiplier effect of the space economy in support of specific sectors, including precision farming, artificial intelligence, advanced robotics, orbital energy, environmental monitoring and telemedicine, offering guidance to Member States on how EU law can foster such synergies²;
- 1.15 recommends that an integrated strategy for space skills and jobs be developed and a European Space Skills Agenda be adopted, encouraging partnerships between social partners, schools, universities and space agencies;

¹ EUSPA could act as the operational hub for the EU’s ‘one-stop shop’, consolidating operator applications, technical assessments, and compliance checks, ensuring uniform application of EU baseline standards, while preserving Member States’ authorisation rights.

² As an example, the Commission should guide Member States on using satellite imagery for accelerating the implementation of the EU Methane Regulation.

- 1.16 calls for adequate resources to be provided for the operational reinforcement of EUSPA in the next Multiannual Financial Framework 2028-2034;
- 1.17 recommends clarifying Section 3 on Qualified technical bodies for space activities (Article 34 and following) to better define the competences and roles of the qualified technical bodies in order to avoid potential conflicts with EUSPA's tasks;
- 1.18 highlights the need for the regulation to promote a system that balances the freedom to conduct a business with collective responsibility by providing incentives for private investment and innovation, while at the same time imposing binding standards on transparency, sustainability, fairness and the protection of the general European interest.

2. EXPLANATORY NOTES

Arguments in support of recommendation 1.1

- 2.1 The regulation acknowledges the need to boost the competitiveness of the European space ecosystem through targeted investment. It also acknowledges this global competition and aims to strengthen the Union's position as a leading space player. However, the EESC believes that additional financial and industrial instruments are needed to achieve this goal.
- 2.2 The global economic potential of space requires a stronger stance from the EU. According to the Draghi report, the value of the global space economy reached EUR 572 billion in 2023 and is expected to exceed EUR 1 628 billion by 2035, with an annual growth rate of over 9%.
- 2.3 The objectives of the European Commission's recent Scale-up Strategy should be extended to the aerospace industry. This would support the growth of European space companies into global leaders, and ensure that industrial policies provide the necessary financial, regulatory and technological tools for scaling up while keeping high-quality and socially sustainable jobs in Europe.
- 2.4 With a view to ensuring the EU's strategic autonomy, access to the European space market should be guided by the principle of reciprocity with third countries. At the same time, industrial policies should focus on consolidating strong European players rather than fostering excessive fragmentation. When it comes to participation in strategic and dual-use programmes, priority should be given to accredited European operators, subject to cost-control mechanisms and full compliance with social and environmental requirements. This will ensure both competitiveness and the protection of the general European interest.

Arguments in support of recommendation 1.2

- 2.5 The regulation promotes the sustainability, safety and resilience of space activities, but such objectives must be accompanied by ambitious industrial policies at EU level; without a structural increase in investment, the safety, competitiveness and autonomy objectives set out in the regulation cannot be met.

- 2.6 Dependence on non-EU providers for key components (e.g. semiconductors, propulsion and launcher technologies) constitutes a critical vulnerability, especially in an uncertain geopolitical climate³. In addition, Europe's share of global space launches dropped from 11% in 2021 to 4% in 2022, with a significant loss of industrial capacity and strategic autonomy⁴.
- 2.7 Europe's investment in space is significantly lower than that of its main competitors. The EU currently allocates only 0.07% of its GDP to space, compared to an average of 0.25% in the US and higher levels in China, India and Japan. This structural imbalance undermines Europe's ability to foster autonomous innovation, maintain strategic critical infrastructure and combat dependence on technologies, data and services from third countries⁵.

Arguments in support of recommendation 1.3

- 2.8 Regulatory fragmentation among Member States is due less to substantial differences in the content of national laws (which follow a common model based on UN Resolution 68/74) than to the fact that Article 189(2) of the TFEU excludes any harmonisation of national laws. However, inconsistency could arise if the regulation introduces obligations that are incompatible with UN treaties that have already been ratified (OST Treaty, ARRA Treaty, LIAB Convention, REG Convention). The EU is not party to these conventions and this undermines its credibility as a global standard setter, making it necessary to preserve existing international commitments.
- 2.9 The EESC supports the regulation as a decisive step towards a coherent and competitive European space framework. However, clarification of the use of Article 114 TFEU as the legal basis is needed to guarantee that the regulation effectively contributes to the achievement of the Union's strategic objectives within the European legal and policy framework.
- 2.10 Certain terms appear to be applied inconsistently. For example, Article 1(1) refers only to 'space-based data and services', while the recitals and other provisions also refer to 'space products'. The regulation should use the phrase 'space products, services and data' consistently throughout the text.

Arguments in support of recommendation 1.4

- 2.11 The UN outer space treaties and conventions, in particular the 1967 Outer Space Treaty (OST), assign responsibilities and obligations to the state of which the operator is a national. By limiting itself to the criterion of the state of establishment, the draft regulation, as it stands, could lead to uncertainties in interpretation and divergences from international law. Integrating both criteria would meet requirements concerning regulatory clarity, judicial protection and the correct distribution of responsibilities, avoiding potential cross-border disputes. This clarification is also necessary given the need for specific coordination with certain national laws, such as the Italian Space Law of 2025 and the Portuguese Space Law of 2019, which already provide for the

³ EU Publications Office, *Aerospace & Defence Ecosystem*, p. 2-3.

⁴ EU Publications Office, *Aerospace & Defence Ecosystem*, p. 2-3.

⁵ EPRS, *EU Capabilities in Space*, EPRS_IDA(2025)765792, p. 7.

possibility of recognising authorisations or licenses issued by foreign States on an equivalent basis.

Arguments in support of recommendation 1.5

2.12 Title II refers to the national regimes for the authorisation and registration of space activities and sets out to harmonise minimum standards on safety, resilience and sustainability, while abiding by national prerogatives and the ban on harmonisation laid down by Article 189(2) of the TFEU. The proposal appears to be balanced: it seeks to establish a common European framework in order to avoid regulatory differences that could distort the internal market, without modifying Member States' responsibilities. However, there are still some grey areas that require clarification in order to ensure legal certainty and uniform application:

- derogations: criteria, conditions and the limits to which they may be used are not clear;
- procedural flexibility: the room for manoeuvre granted to the Member States could lead to different timeframes and conditions;
- authorisation timelines: the lack of clear deadlines could create uncertainty for operators;
- applicability to non-commercial missions: it is not specified how and to what extent these rules will apply to such missions;
- the Commission's inspection powers: limits, arrangements and interaction with national authorities must be clarified;
- role of the ESA and EUSPA: the distribution of operational responsibilities is not clearly defined.

Providing specific guidance on these aspects would help to, prevent conflicts of competence and facilitate the harmonised implementation of the regulation.

Arguments in support of recommendation 1.6

2.13 The current wording introduces a degree of ambiguity concerning the acronym **URSO**, as defined in Article 24⁶. As the EU has not joined the 1975 UN Registration Convention, it should be clear that URSO does not replicate its registration duties but rather issues an electronic certificate to space operators under Article 25. Accordingly, it would be more appropriate to rename URSO the **Register of Space Operators**, rather than the **Register of Space Objects**.

Arguments in support of recommendation 1.7

2.14 The principle of mutual recognition is crucial for the unity of the European space market. However, it should be specified more clearly that there is an option to introduce additional requirements on the grounds of safety, resilience or sustainability (Articles 10, 62, 79 and 96). Without objective criteria, there is a risk of recreating internal barriers and legal uncertainty for operators, undermining European competitiveness in an increasingly competitive global context.

⁶ Article 24 states that 'The Agency shall set up a Union Register of Space Objects (URSO) for the registration of: (a) Union space operators authorised [...]; (b) Union space operators that are entities [...]; (c) third country space operator [...] s; (d) international organisations [...].'

Arguments in support of recommendation 1.8

- 2.15 Avoiding regulatory fragmentation: Article 8 of the regulation introduces the principle of mutual recognition of authorisations among Member States, but reinforcing this and covering more practical application would mitigate the risk of duplicate or diverging procedures, prevent forum shopping and ensure a level playing field in the internal market.
- 2.16 Simpler procedures for SMEs and smaller operators: Articles 10, 62 and 69 envisage a ‘light regime’ and requirements adapted to smaller operators; a one-stop shop coordinated by EUSPA would apply such simplifications in a uniform manner, reducing time and costs.
- 2.17 Operational role of EUSPA: Article 19 grants EUSPA a technical support and coordination role; a one-stop shop would make it more effective, providing transparency, guidance to operators and connection with national authorities.
- 2.18 Supporting competitiveness and strategic autonomy: a harmonised and centralised system would reduce administrative barriers, thus making the European regulatory framework more attractive and strengthening the EU’s leadership in the space sector,
- 2.19 Ensuring consistency with international law: centralised coordination and mutual recognition would facilitate alignment with the international obligations referred to in Article 6, while also improving interoperability with global registers such as that set up by the UN.

Arguments in support of recommendation 1.9

- 2.20 The implementing acts will define most of the practical operational requirements. A participatory process rules out solutions that are overly centralised or disconnected from industry and ensures harmonisation that is actually effective and sustainable.

Arguments in support of recommendation 1.10

- 2.21 The resilience aspect is crucial, but the current framework runs the risk of generating multiple and potentially conflicting obligations. Explicit regulatory coordination would guarantee coherence, reducing compliance costs and improving the effectiveness of safety measures.

Arguments in support of recommendation 1.11

- 2.22 Access to the EU market for non-EU operators should guarantee fair conditions of competition and avoid strategic dependencies. Clear procedures would boost predictability for businesses and the EU’s credibility as a regulatory actor.

The current wording provides for a complex system based on agreements with non-EU authorities whereby inspections are allowed, but fails to specify whether the EU has direct inspection powers or how to apply the rules outside the EU. This uncertainty could lead to gaps in controls, jurisdictional conflicts and market distortions.

Establishing specific rules on recognition, monitoring and enforcement would bolster legal certainty, uniform application and the EU's international credibility, while safeguarding the safety, sustainability and competitiveness of the European space sector.

Arguments in support of recommendation 1.12

- 2.23 Introducing a binding system for the calculation and certification of the environmental footprint of space missions is a positive step, but must be implemented in a proportionate manner. It is essential to maintain the strategic capabilities of European industry, safeguard technical skills and strengthen the sector's employment impact so that environmental sustainability contributes to growth and competitiveness.

Arguments in support of recommendation 1.13

- 2.24 The regulation acknowledges the emerging role of SMEs, and provides for technical assistance and capacity building measures (Articles 30-32; recital 40 refers to the role of SMEs in promoting innovation in the sector), in particular through EUSPA. Nevertheless, their effective inclusion in procurement and research programmes needs to be strengthened.
- 2.25 European economic potential in space is estimated to be EUR 140 billion per year by 2050. According to the EPRS report, effective and coordinated action at European level in terms of legislation, industry and infrastructure could generate up to EUR 140 billion per year in direct and indirect economic benefits by 2050. This figure concerns both primary space activities (launches, constellations, GNSS services) and authorised sectors such as precision farming, orbital energy, smart logistics and climate resilience⁷.

Arguments in support of recommendation 1.14

- 2.26 The regulation acknowledges the systemic potential of the space economy, but needs to capitalise on the links with European policies and strategies (Green Deal, twin transition, strategic autonomy).
- 2.27 EUSPA as a EU agency providing solutions for users, could further and intensively support the development of critical 'Made in EU' receivers, terminals and other user components to enable the penetration of space-based solutions in the EU in a cross-sectoral manner.

Arguments in support of recommendation 1.15

- 2.28 The regulation focuses on the capacity building of operators. Without a skilled workforce, regulated competitiveness is unsustainable. The regulation recognises the importance of skills, but a structural EU strategy is needed to attract talent.

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[https://www.europarl.europa.eu/thinktank/en/document/EPRS_IDA\(2025\)765792](https://www.europarl.europa.eu/thinktank/en/document/EPRS_IDA(2025)765792).

- 2.29 The development of the space economy drives the creation of new employment ecosystems that are able to attract young talent and strengthen territorial cohesion. According to the EPRS, sectors linked to the space economy such as artificial intelligence, robotics, quantum computing, space farming and space-based solar power could account for more than one million new jobs by 2040⁸.

Arguments in support of recommendation 1.16

- 2.30 The EESC is pleased that the Space Act intends to strengthen the role of the EUSPA; however, this requires an appropriate allocation of financial resources. Only a suitable financial envelope can transform the regulation's ambitions into real operational capabilities.

- 2.31 Title III of the proposed regulation introduces particularly demanding obligations for the Member States. It is therefore crucial to bolster EUSPA's operational capacity so that it can provide national administrations with technical assistance, guidance and coordination support.

Arguments in support of recommendation 1.17

- 2.32 Concerning the qualified technical bodies, a clearer definition of their competences and coordination mechanism is necessary to prevent duplication and promote consistent governance across the Union.

Arguments in support of recommendation 1.18

- 2.33 The regulation introduces strict requirements for space operators (Articles 16-26), including obligations concerning the safety of operations, environmental sustainability and cybersecurity, which must be complied with in order to obtain authorisation to carry out space activities. These requirements, which include the Life Cycle Assessment (LCA), deorbiting plans and business continuity, are a significant first step towards regulation geared towards responsibility. However, with the increasing privatisation of space activities and the emergence of global industrial actors, action must be taken to reinforce the principle of corporate social responsibility, including with regard to the EU's objectives concerning social cohesion, sustainability and equity in access to space resources.

Brussels, 4 December 2025.

The President of the European Economic and Social Committee
Séamus BOLAND

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N.B.: Appendix overleaf.

⁸ EPRS_IDA(2025)765792, p. 21-23.

APPENDIX to the OPINION
of the
Section for Transport, Energy, Infrastructure and the Information Society

LEGISLATIVE FOOTPRINT

**LIST OF INTEREST REPRESENTATIVES FROM WHOM THE RAPPORTEUR HAS
RECEIVED INPUT**

The following list is drawn up on a purely voluntary basis under the exclusive responsibility of the rapporteur. The rapporteur has received input from the following interest representatives (organisations and/or self-employed individuals) in the preparation of the TEN/835 opinion on the EU Space Act:

Organisations and/or self-employed individuals
IndustriALL Europe
European Space Policy Institute (ESPI)
Eurisy
European Commission, DG DEFIS, Unit C2 Space Single Market
Eurospace
European Agency for the Space programme (EUSPA)
United Nations Office for Outer Space Affairs (UNOOSA)
