



ANTICIPATING THE NEW EUROPEAN UNION SPACE LAW

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Executive Summary

The European Union (EU) expects to release a new EU Space Law in late 2024 or early 2025. It will likely require non-EU commercial space companies providing satellite services within the EU marketplace, including U.S. companies, to comply with the law and regulations it will impose. While the draft law is being closely held by the EU, analysis of its foundational documents and senior EU leader statements makes it possible to anticipate its objectives and priorities and to make a reasonable prediction of the types of requirements the law will impose on U.S. commercial space operators. Most significantly:

- ◆ Technical standards setting has become a pathway for EU economic, market, and political power, and the EU has identified the commercial space sector as an area of emphasis.
- ◆ The EU Space Law is likely to impose minimum requirements on commercial satellite operators related to cybersecurity, collision avoidance responsibilities, resilience, information sharing, and launch and reentry. Non-EU companies, including U.S. companies, that provide services within the EU and do not comply with the law could face significant fines.

The EU market is significant, and U.S. commercial space companies' future costs of compliance with the EU Space Law may affect U.S. companies' competitiveness. Therefore, the U.S. government should begin developing an approach to the pending EU Space Law—with thorough U.S. commercial space industry input.

Introduction

In January 2024, the European Union’s (EU) commissioner for Internal Market outlined the EU’s plan to harmonize 11 European national-level space laws with a single EU-level law. The stated purpose of the emerging EU Space Law is to protect EU space systems and EU Member State space systems through legal requirements, regulations, and obligatory standards that apply to “any space system operating in the EU (whether EU or non-EU).”¹ The EU commissioner specifically identified on-orbit collision avoidance and deorbiting standards while also stating:

This law will reinforce the position of Europe as a space power, the attractiveness of our single market and our ability to shape norms and standards globally.²

The EU Space Law is expected to require U.S. commercial space companies providing satellite services within the EU market to comply with the law and regulations it will impose.* To understand the law’s significance, the United States needs to look no further than the impact of several recent EU laws and regulation on U.S. companies in other sectors. One example is the EU’s General Data Protection Regulation (GDPR), regulating consumer privacy and data security laws in the EU and requiring organizations, regardless of whether they reside within the EU’s boundaries or not, to comply. Noncompliant U.S. companies can expect significant sanctions and fines from EU regulators. In similar fashion, U.S. commercial space companies could stumble into potential EU sanctions and fines if they are not cognizant of, or do not take seriously, emerging EU Space Law and regulations.

For these reasons, and because the potential EU law has substantial implications for space sustainability, the U.S. government and U.S. commercial space sector should be alert to what is happening within the EU marketplace, the world’s largest single market.³ The U.S. government should be ready to adapt to the challenges the law may present for the U.S. commercial space industry, the U.S. government in terms of DOD commercial integration, and U.S. space leadership.

Introducing the European Space Sector

Within Europe, space activities operate at three distinct levels: the European level, the intergovernmental organization (IGO) level, and the national level (individual countries).

The European Commission (the EU executive branch equivalent) is the primary actor at the European level. The **European Union Space Programme** is implemented by the European Commission’s (EC) Directorate General for Defence Industry and Space (DG DEFIS) and is operated by **the European Union Agency for the Space Programme (EUSPA)**, established in 2021 and with its headquarters in Prague.

EUSPA is separate and distinct from the European Space Agency (ESA) and its space activities, which reside at the IGO level.[†] Importantly, the subject of this chapter is EU space ambitions as manifested in the European Union Space Programme, not ESA’s space ambitions. ESA is not part of the European Union and is not subject to EU law.⁴ ESA also has its own unique governance and funding mechanisms, and while there is overlap among the 27 EU member states and the 22 ESA member states, not all ESA member states are members of the EU (such as the United Kingdom and Canada).⁵ Observers must not make the mistake of conflating the two organizations and their respective space activities. In fact,

* Similarly, the U.S. Federal Communications Commission (FCC) requires that non-U.S. licensed systems meet the same orbital debris mitigation standards as U.S. licensed systems and may impose penalties and fines for noncompliance. The FCC imposed its first-ever penalty for noncompliance with the standards in October 2023 when it fined DISH (a U.S. company) \$150,000.

[†] The other European space-related entity that resides at the IGO level is the European Organization for the Exploitation of Meteorological Satellites (EUMETSAT).

significant friction often exists between the two organization even though they work closely together in many ways to advance European space activities.

Table 1: European Space Activities Levels	
Level	Description
European	EU as owner and operator of Galileo PNT constellation, the Copernicus Earth observation constellation, and EU Space Surveillance and Tracking (SST). Develop and oversee collective space policy, strategy, and activities for EU: <ul style="list-style-type: none"> ♦ European Commission ♦ Common foreign and security policy
Intergovernmental organization (IGO)	European multi-state organizations: <ul style="list-style-type: none"> ♦ European Space Agency ♦ European Organization for the Exploitation of Meteorological Satellites (EUMETSAT)
National	State's individual civil and defense space activities and agencies: <ul style="list-style-type: none"> ♦ Examples: Belgium, France, Germany, Italy, Spain, the United Kingdom, Poland, Norway, Luxembourg, Sweden, and so forth

EU space activities are approved, directed, and operated by the EU to meet EU political, economic, security, and defense objectives and to ensure EU economic, technological, and political autonomy. EU space activities receive significant funding from various places within the EU budget.

An EU Approach for Space Traffic Management defines STM as the means and rules to access, conduct activities in, and return from outer space safely, sustainably, and securely.

The EU Space Programme’s three flagship satellite programs, operated by EUSPA, are:

1. **Galileo.** A global satellite positioning, navigation, and timing (PNT) system similar to the U.S. Global Positioning System (GPS)
2. **Copernicus.** An Earth observation system
3. **The European Geostationary Navigation Overlay Service.** A regional satellite-based positioning, navigation, and timing augmentation system similar to the U.S. Wide Area Augmentation System.

In early 2022, the European Commission (EC) proposed two new flagship programs related to space. The first new initiative is development of IRIS,² an EU-funded, developed, and operated large low Earth orbit (LEO) constellation to enable high-speed broadband everywhere in Europe (and implicitly around the globe).[‡] The second program is to establish an EU space traffic management (STM) approach with the ambition to “be at the forefront of the development of STM guidelines and standards.”

Foundations of EU Space Law

The 2022 *EU Approach for Space Traffic Management*[§] and the 2023 *EU Space Strategy for Security and Defence* are driving and shaping the EU Space Law. First, articulated in February 2022, the EU STM approach notes the critical importance of STM for space safety, security, and sustainability. The approach calls for the EC to develop enabling

[‡]Infrastructure for Resilience, Interconnectivity and Security by Satellite

[§]The 2022 EU STM approach has many similarities to the 2018 U.S. Space Policy Directive-3, *National Space Traffic Management Policy*.

legislation for STM-related nonbinding measures and binding obligations on satellite operators. Most interestingly, the approach includes the possibility of imposing future EU STM legal requirements and mandatory standards on **any satellite operator** providing services within the EU.⁶

Second, recognizing space threats and the importance of resilient space assets to security, the EU released its inaugural *EU Space Strategy for Security and Defence* in March 2023. The strategy’s goal is to allow the EU to protect its space assets, defend its interests, deter hostile activities in space, and strengthen its strategic posture and autonomy.⁷ Building directly on the EU STM approach, the strategy calls for the EC to propose an EU Space Law that provides a common framework within the EU for security, safety, and sustainability in space. The *EU Space Strategy for Security and Defence* explains that a standard approach across the EU is needed to share information across EU Member States, to protect space systems from threats, and to enable EU-wide cooperation during space security incidents.

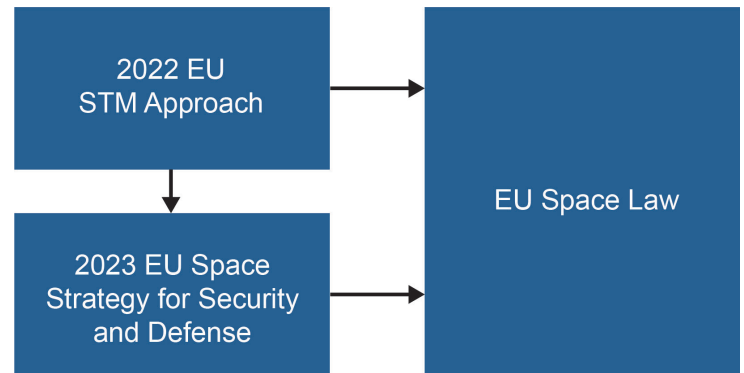


Figure 1. EU space law drivers.

Due to the EU’s current lack of a common legal framework for space activities, national-level space laws and regulations create a fragmented regulatory landscape within the EU, putting it at a competitive disadvantage in the global marketplace. In fact, eleven EU Member States have their own unique national space laws, and more Member States are in the process of adopting national space laws. Besides putting the EU at a competitive disadvantage, the EU judges that such fragmentation in space law weakens its autonomy and strategic posture.⁸

In the EU’s State of the Union 2023 Letter of Intent, EU President Ursula von der Leyen indicated that an EU Space Law is a key priority for 2024.⁹ At the time of this writing, the draft EU Space Law is expected to be released in late 2024 or early 2025, after new EU leadership takes its place following the 2024 EU parliamentary elections. In the meantime, the draft law is being closely held by the EC with few details publicly revealed. However, close examination of the *2022 EU Approach for Space Traffic Management* and the *2023 EU Space Strategy for Security and Defence*, as well as statements from senior EU officials, provide a general sense of the areas the law may cover and what the law may include. Also, based on the precedents set by EU laws affecting other economic sectors, the EU will likely delegate licensing of space activities and monitoring and enforcement of the EU Space Law to the EU member states. From this analysis, U.S. observers may anticipate what features of the EU Space Law may have an impact on the United States and the U.S. commercial sector in the coming years.

Analysis and Key Findings

The analysis, detailed in the appendix herein, identifies several relevant objectives, priorities, features, and actions called for in the EU STM approach and the *EU Space Strategy for Security and Defence*. The analysis also includes statements from senior EU leaders, and predictions from media and other observers. From a synthesis of the information in these sources, we can reasonably forecast that the EU Space Law could require the following measures:

- ◆ Cybersecurity requirements
 - ▶ Increased cybersecurity hardening requirements and standards across the supply chain.
 - ▶ Increased cyber incident monitoring, assessment, information sharing, and reporting.

- ◆ Collision avoidance requirements
 - ▶ Establishment of minimum requirements.
 - ▶ Use of active tracking devices on satellites.
 - ▶ Systemized notifications and warnings of any major incident or reentry.
 - ▶ Commercial satellite operators subscribe to a collision avoidance service at least to similar level of performance as the current EU Space Surveillance and Tracking partnership.
 - ▶ Commercial entities that provide collision avoidance services for satellite operators maintain communication mechanisms and contacts (i.e., operators' directory) for managing conjunction events with satellite operators and other collision avoidance service providers.
- ◆ Resilience requirements
 - ▶ Critical space services have a minimal level of resilience.
- ◆ Information sharing requirements
 - ▶ Increased information-sharing regarding threats and security incidents.
- ◆ Launch and reentry licensing requirements
 - ▶ Standardized EU criteria for launch and reentry licensing.
 - ▶ Licensing provided by individual EU Member States.
- ◆ Monitoring and enforcement of EU law
 - ▶ Provided by individual EU Member States.

Why It Matters

The emerging EU Space Law is likely to be more stringent on various points than current U.S. regulations. With 440 million consumers, the European Union is the world's largest single market and largest economy.¹⁰ Such a large market may make it difficult for U.S. commercial satellite service companies to forego the opportunity to sell services within the EU in order to avoid the law, even if they would prefer to operate under the more lenient U.S. standards.

Even though the EC has revealed few details about the new EU Space Law, observers can anticipate several implications for U.S. industry and the U.S. government. First, based on previous EU rules like GDPR, it is not difficult to imagine a scenario in which the EU mandatory rules impose higher costs or restrictive requirements on U.S. commercial space enterprises providing services within the EU marketplace. Importantly, while large, well-established enterprises may be able to manage the costs of compliance, newer companies may struggle to absorb the additional costs.¹¹

The GDPR, the Digital Markets Act (DMA), and the 2024 EU Artificial Intelligence Act (AI Act) serve as useful case studies for what U.S. commercial space companies, large or small, may expect.

- ◆ **General Data Protection Regulation (GDPR).**
 Reacting to EU citizens' demand for privacy protections, in 2018, the EU implemented the General Data Protection Regulation (GDPR).¹² The GDPR is an extensive set of data privacy and security laws applying to EU and non-EU companies operating in or offering services in the EU. The overall intent of the laws is to protect the data of EU

citizens by imposing mandatory measures and hefty monetary fines for noncompliance.¹³ Depending on the infringement, GDPR imposes a “maximum penalty up to €20 million or 4% of global revenue, whichever is higher” per incident.¹⁴ EU regulators have fined U.S. companies hundreds of millions of dollars for not complying with EU law. In the past few years, the EU’s Data Protection Commission fined Meta (Facebook and Instagram’s parent company) more than US\$410 million, Amazon US\$888 million, WhatsApp US\$267 million, and Google US\$90 million.¹⁵

- ◆ **Digital Markets Act (DMA)**

The DMA’s intent is to prevent anti-competitive behavior from big digital technology players and make sure they do not have a monopoly in the EU by forcing them to open some of their services to competition. Currently, the DMA mainly impacts the U.S. technology giants Alphabet, Amazon, Apple, Meta, and Microsoft. To comply with the DMA and open the EU marketplace to more digital competition, these U.S. companies must change their platforms.¹⁶

The DMA came into effect on March 7, 2024, and on March 25, 2024, the EU opened investigations on Apple, Google, and Meta for possibly violating the law. According to the DMA, violators could be fined up to 10 percent of the company’s total worldwide annual turnover or up to 20 percent in the event of repeated infringements. If necessary, nonfinancial remedies can be imposed, possibly including forced divestiture of (parts of) a business.¹⁷ In June 2024, Apple announced that due to the DMA, forthcoming iPhone 15 Pro, iPhone 15 Pro Max, and all iPhone 16 models that include Apple Intelligence features will not be available in Europe, resulting in the loss of millions of potential new iPhone customers for Apple.¹⁸

- ◆ **Artificial Intelligence Act (AI Act)**

The recent 2024 EU Artificial Intelligence Act (AI Act) is part of a set of regulations aimed at creating a robust framework, not just for Europe but for the world in promoting trustworthy AI “by ensuring that AI systems respect fundamental rights, safety, and ethical principles and by addressing risks of very powerful and impactful AI models.”¹⁹ U.S. companies will have to comply with the laws if they are using data within their AI from EU customers.²⁰ The EU AI law will come into force in 2026 and, depending on the violation, companies could be fined on a scale of anywhere from €7.5 million (or 1.5 percent of annual turnover) to €35 million (or 7 percent of turnover) per violation.²¹

Understanding the forthcoming EU Space Law also matters for international STM standard setting. EU ambitions include demonstrating leadership in global STM standards development and promoting standards internationally that reflect EU values.²² The 2022 EU STM approach calls for the EU to be proactive and at the forefront of international STM standard setting. To enable this ambition, the EU has established a forum called “The STM Stakeholder Mechanism,” which aggregates EU Member State and other stakeholder requirements, synthesizes stakeholder views, coordinates external engagement, and promotes the EU STM approach internationally.²³ Underlining the EU’s ambition, while emphasizing space cybersecurity standards, the 2023 *EU Space Strategy for Security and Defense*, says better EU representation is crucial in international standardization organizations.

The forthcoming EU Space Law likely will contain provisions to enable these ambitions. As the EU grows more experienced in aggregating the preferred standards of the EU Member States and those of other European stakeholders it is likely the EU will seek more influence in shaping the standards adopted by international standardization bodies such as the International Organization for Standardization (ISO). This implies that U.S. leadership in setting global standards may erode in some areas.

In that way, the EU Space Law also has implication for the U.S. ability to shape space-related standards. A telling example of why standard-setting matters is the EU’s adoption of the Global System for Mobile (GSM) Telecommunications

standard in the late 1980s. The EU passed laws at that time requiring GSM be the standard in Europe, which gave Europe an early advantage in the rapidly growing global mobile telecommunications market and made Europe the leader in mobile telephony.²⁴ Except for within the United States and a handful of other places, GSM became the *global standard*, severely impacting growth in the U.S. mobile telephony industry at the time.²⁵

The EU Space Law could also impact the U.S. Department of Defense (DOD) strategy to integrate commercial space capabilities into DOD space architectures. If U.S. space companies want to provide services within the EU, they will have to bear the costs of complying with the EU Space Law, and those costs might be passed onto the DOD and other customers. If U.S. space companies, large or small, decide not to provide services within the EU so they can avoid incurring the costs of complying with the EU Space Law, they narrow their addressable market considerably and therefore will be more likely to rely on the DOD. Either choice may result in higher costs for the DOD.

Conclusion

Several recent examples of EU law impacting U.S. companies in non-space sectors provide analogies to a potential future with an EU Space Law. U.S. commercial space companies could be caught unprepared for future requirements and standards, and the burden of compliance may be unexpected and unwelcome. The U.S. government might be requested to help relieve some of the burden, or U.S. regulators may need to eventually follow suit, representing a loss of prestige and leadership for the United States. Moreover, the U.S. strategy to integrate commercial space capabilities into national security space architectures may be impacted in unexpected ways.

The U.S. space community should prepare for the forthcoming EU Space Law, including senior decisionmakers and other observers learning about the three levels of European space governance and space activities. The U.S. space community needs to understand the differences among major European stakeholders and appreciate the diverse interests, motives, priorities, and funding mechanisms of each, and recognize that each operates under different political and legal structures. Once understood, the U.S. interagency can begin developing an informed approach to the pending EU Space Law—with thorough U.S. commercial space industry input. As usual when it comes to the U.S.–EU relationship, a delicate balance between cooperation and competition is the only way forward.

Appendix

Table A-1 identifies several relevant objectives, priorities, features, and actions called for in the 2022 *An EU Approach for Space Traffic Management*. Table A-2 derives the same from the *EU Space Strategy for Security and Defence*. Table A-3 highlights what senior EU leaders have emphasized, and Table A-4 captures predictions from media and other observers.

Table A-1: 2022 EU STM Approach	
Objectives	
<ul style="list-style-type: none"> ◆ Identify possible areas for an EU STM legislation and, by 2024, make a proposal for an EU STM legislation. ◆ Preserve EU interests and autonomy. ◆ Contribute to the security and defense dimension of the EU in space. ◆ Contribute to the preservation of a safe, sustainable, stable, and secure outer space. ◆ Enable emergence of a well-functioning EU internal market important to the development of EU goods and services associated with the use of space. ◆ Aim to develop a common level playing field at the EU level, which would ensure that the most virtuous operators are not penalized. ◆ Guarantee that EU operators do not suffer from distortion of competition by operators established outside the EU benefiting from less stringent standards by imposing equal treatment to EU operators and to any satellite operator intending to provide services within the EU (i.e., imposing legal obligations, rules, and regulations on any satellite operator providing services within the EU). 	
Ambitions	
<ul style="list-style-type: none"> ◆ European standardization organizations develop harmonized technical standards and guidelines for STM. ◆ Manufacturers and operators prove compliance with the technical standards and guidelines developed by European standardization organizations. ◆ Proactively ensure the development of international standards where feasible and needed. ◆ Make the best use of the EU's capabilities and innovation in the field of space surveillance and tracking (SST). ◆ Support EU-level STM standards and guidelines, for example: <ul style="list-style-type: none"> ▶ The use of active devices to facilitate the tracking of satellites. ▶ The warning of any major incident or reentry. ▶ Guidelines for special cases of STM, such as nonmaneuverable satellites or constellations. 	
Actions	
<ul style="list-style-type: none"> ◆ Establish an EU forum aimed at ensuring a holistic EU approach on STM in international standardization for dealing with STM. Member States and all other EU actors, such as the EU SST Partnership, EU industry, etc., will have the opportunity to participate. ◆ Prioritize the most impactful standards and guidelines, and promote their implementation through a toolbox and recommendations. ◆ Develop a toolbox based on identified STM standards and guidelines, which could help Member States when they grant licences for the provision of services requested by satellite operators over their territory. 	
Incentives	
<p>Establish incentives for satellite operators to comply with nonbinding guidelines and standards, for example:</p> <ul style="list-style-type: none"> ◆ A "safe space" label based on award criteria. ◆ Awards. ◆ A list of companies and operators who implement STM guidelines or standards. 	
Highlights of Potential Legislation, Law, Regulations, Legally Binding Rules	
<ul style="list-style-type: none"> ◆ Legally compel satellite operators to register with a collision avoidance service that offers at least a similar level of performances as the current services offered by EU SST. ◆ Legally compel entities in charge of collision avoidance services to maintain communication mechanisms and contacts (e.g., operators' directory) at their disposal for managing conjunction events with other service providers. 	

Table A-2: 2023 EU Space Strategy for Security and Defence

Objectives

- ◆ Build on the joint communication for *An EU Approach for Space Traffic Management*.
- ◆ Develop EU-wide security framework for the protection of space systems, information-sharing, and cooperation on space security incidents.
- ◆ Strengthen the technological sovereignty of the EU space sector:
 - Reduce strategic dependencies on countries outside the EU.
 - Boost the resilience of critical industrial value chains.
- ◆ Collectively enhance the level of resilience of space systems and services in the EU and ensure coordination between Member States.

Ambitions

- ◆ Ensure that EU competition rules and international trade instruments are fully applied to tackle challenges faced by the EU space and defense sectors, such as the risk of distortive foreign subsidies. This should include investigating certain acquisitions of EU companies active in these sectors, which may be facilitated by illegal foreign subsidies.
- ◆ Greater steering of the EU in the development of standards:
 - Better representation in international standardization organizations is crucial, in particular to protect the security interests of the EU and its Member States.
 - Coherence with North Atlantic Treaty Organization (NATO) standards will be encouraged.

Actions

- ◆ The EC will consider proposing an EU Space Law to ensure a consistent EU-wide approach and build on the joint communication for an EU Approach for Space Traffic Management.
- ◆ The EC will consider proposing an EU Space Law that enhances the level of security and resilience of space operations and services in the EU as well as their safety and sustainability.
- ◆ It will encourage the development of resilience measures in the EU and foster information-exchange on incidents as well as cross-border coordination and cooperation.
- ◆ The EC will assess the need to establish new industrial alliances related to technologies that are relevant for space and defense in compliance with the EU competition rules.
- ◆ More systematic integration of relevant security standards in the early design phase of these systems.
- ◆ The EC will consider establishing an Information Sharing and Analysis Center (ISAC), bringing together commercial entities and relevant public entities, including, possibly, the European Space Agency (ESA).
- ◆ The EC, with the support of the EUSPA, will establish an ISAC (EU Space ISAC) to strengthen the resilience of capabilities of the EU space industry (upstream and downstream), including New Space.

Incentives

- ◆ Incentivize the exchange of information on threats targeting space assets or their supply chain.
- ◆ Incentivize the development of standardized interfaces (covering security aspects) between satellites and responsive launch systems to ensure future satellites' interoperability and access to space solutions and to support the development of innovative in-orbit transportation solutions.

Highlighted Potential EU Legislation, Law, Regulations, and Legally Binding Rules

- ◆ Mandate cybersecurity requirements as part of the design of all space systems delivering essential services.
- ◆ Member States could be required to identify essential space systems and services, for example:
 - Identify major supply chain actors.
 - Define and implement a common minimum level of resilience for critical space services.
 - Develop coordinated national preparedness and resilience plans and emergency protocols.
 - Develop security monitoring centers to allow for the notification of security incidents in a systematic manner.
- ◆ Consider requirements to make sure that security, including cybersecurity, is part of the design of all space systems delivering essential services. The EU could propose the more systematic integration of relevant security standards in the early design phase of these systems.
- ◆ Consider specific cybersecurity standards and procedures in the space domain as part of the EU Space Law where relevant.
- ◆ Establish an EU information exchange network that would provide through EUSPA a comprehensive first level of analysis and reporting of satellite anomalies and security incidents that signal a space threat.

Table A-3: Statements from the EU and EU officials

- ◆ “The proposed EU space law will set rules on space traffic management and will provide a framework to ensure the safety of the critical space infrastructure.” EU Parliament commentary regarding Letter of Intent from the President of the Commission Ursula von der Leyen to the president of the European Parliament, and to the presidency of the Council of the EU.²⁶
- ◆ “We need to build a true EU Single Market for space. This is the purpose of the upcoming EU Space Law.” Thierry Breton, commissioner for Internal Market of the European Union.” January 2024.²⁷
- ◆ “The EU Space law will set common rules related to space activities, focusing on 3 aspects: safety, resilience and sustainability, bringing legal certainty and stimulating innovation.” Thierry Breton, January 2024.²⁸
- ◆ “It is also a matter of security. In the current geopolitical context, the protection of our space systems from systemic security risks is a must, through minimum requirements for any space systems operating in the EU (whether EU or non EU). For instance on anti-collision, deorbiting standards but also on cyber security risks management....” Thierry Breton, January 2024.²⁹
- ◆ “This law will reinforce the position of Europe as a space power, the attractiveness of our single market and our ability to shape norms and standards globally.” Thierry Breton, January 2024.³⁰
- ◆ “To protect our space systems and increase their resilience, we need to be able to monitor our infrastructures and better detect potential threats in space to ensure timely reactivity.” Thierry Breton, January 2024.³¹
- ◆ Non-attribution discussion, April 2024
The EU Space Law is a set of mandatory measures. The push is for hard law and mandatory standard, not voluntary best practices.
 - ▶ The EU Space Law will harmonize across the EU Member States, all licensing for launch, collision avoidance, and reentry. Licensing will remain the responsibility of the Member States.
 - ▶ The Member States will be left to enforce the law, not the EU.
 - ▶ Non-EU entities will have to follow EU Space Law to provide services within the EU.
 - ▶ The EU considers collision avoidance services to be a government responsibility due to the strategic nature of the space domain.
 - ▶ The draft EU Space Law is 150 pages.

Table A-4: Media and Observer Predictions

- ◆ “According to documents seen by POLITICO, the bloc’s diplomats have been briefed on plans to create an EU Space Label that will be used to designate companies that play by the new rules on sustainability and security.”³²
- ◆ “The EU Space Law will set standards to curb light pollution caused by growing satellite constellations and limit greenhouse gas emissions and pollution caused by rocket launches.”³³
- ◆ “The Commission aims to use the lure of its single market as the muscle to make the new rules stick.”³⁴
- ◆ “The Space Law will be a regulation.”³⁵
- ◆ Euractiv reporter paraphrasing remarks by EC official, Guillaume de la Brosse, (EC Innovation and New Space Head of Unit).
 - ▶ The upcoming EU Space Law will focus on cybersecurity by design, hardening the security levels of space’s industry supply chain and applying (cyber)security measures proportionally to how critical certain products are deemed.
 - ▶ Companies will be required to mitigate their risks by conducting assessments and evaluating potential events threatening their infrastructure.
 - ▶ Companies will be required to prevent, detect, and protect themselves against cyber incidents. The upcoming EU Space Law will also provide a framework on how to handle these incidents. Eventually, the law will detail to whom and how to report cyber incidents.
 - ▶ Regarding sustainability, the “level of ambition [of the law] will be quite low,” said de la Brosse.³⁶

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