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Targeted stakeholder consultation on EU legislative initiative on safety, resilience and sustainability of space activities ('EU Space Law')

Fields marked with * are mandatory.

Targeted stakeholder consultation on EU legislative initiative on safety, resilience and sustainability of space activities ("EU Space Law")

The European Commission is carrying out this targeted stakeholder consultation to help assess the current situation and problems and to substantiate with public feedback the analysis of the problems.

The survey aims at gathering views, opinions and input from policymakers and space experts (at European, international and Member States levels), representatives of the space industry (upstream sector - satellite operators, downstream sector, and users), NGOs, astronomers and citizens in relation to the policy initiative of the an EU Space Law.

The online questionnaire will be available until **2 November 2023.**

The survey consists of **two parts**:
1) Questions about the respondent.
2) Questions related to the current situation and the problem assessment.

The policy options are attached as a separate document.

Completing the survey should take you a maximum of **30 minutes**. Please answer all questions to the best of your knowledge/ability. Should you encounter any problems with the survey or have questions or additional comments, please contact **defis-sst@ec.europa.eu** and **DEFIS-B2@ec.europa.eu**.

This information will be used for the purpose of an impact assessment. A summary of the answers will appear as an annex, but the personal data of respondents will be anonymised

☑ I agree with the personal data protection provisions (see privacy statement below)

Please consult the privacy statement:

PRIVACY_STATEMENT_TARGETED_CONSULTATION_EUSL_.pdf

Part 1 – Questions about the respondent

1. First name

David

2. Surname

Many

3. Email

david.many-girardot@cosmosforhumanity.eu

4. I am giving my contribution on behalf of…

- (●) My organisation
- ( ) Myself
- ( ) Other

5.1 Organisation type

- [ ] Academic/research institution
- [ ] Business association
- [ ] Company – Spacecraft manufacturer
- [ ] Company – Space operator
- [ ] Company – Airline or Air Navigation Service Provider
- [ ] Consumer organisation
- [ ] Environmental organisation
- [x] Non-governmental organisation (NGO)
- [ ] Public authority
- [ ] Trade union
- [ ] Other

5.2 Is your organisation legally established in:

- ( ) EU Member State
- (●) Non-EU country

5.4 Please specify the country

SWITZERLAND

5.5 If your organisation is subsidiary of an international group, please specify the jurisdiction where the headquarters are incorporated

- ( ) EU Member State
- ( ) Non-EU country

5.7 Please specify the country

SWITZERLAND

5.8 Position

Secretary

5.9 Organisation scope

- (•) International
- ( ) Local
- ( ) Regional
- ( ) National

5.10 Organisation size

- (•) Micro (1 to 9 employees)
- ( ) Small (10 to 49 employees)
- ( ) Medium (50 to 249 employees)
- ( ) Large (250 and more)

5.11 Organisation name

255 character(s) maximum

NGO Cosmos for Humanity

5.12 Transparency register number

(Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.)

255 character(s) maximum

277716451375-08

5.16 Which domain do you cover

- [x] Safety and sustainability in space
- [ ] Resilience/security
- [x] Sustainability on Earth

Part 2 – Questions about the current situation and the problem assessment

Safety-related questions

Safety refers to the practice aimed at ensuring the protection and well-being of astronauts, spacecraft and the orbital environment. It involves mitigating risks and preventing accidents or incidents that could have harmful consequences (e.g., space debris generation, loss of space assets), hereby ensuring the long-term viability of space activities. Safety is therefore related to sustainability in space. It requires rules for mitigation and remediation, for example relating to the responsible disposal of space hardware, monitoring spacecraft end-of-life impacts and measuring propellant residuals.

6. Do you agree that the increasing number of space activities and debris causes risk of collision in space and upon re-entry into the Earth's atmosphere?

- (●) Strongly Agree
- ( ) Agree
- ( ) Undecided
- ( ) Disagree
- ( ) Strongly Disagree

7. Please indicate what you consider to be the main space safety risks, on a range from 1 (low risk) to 5 (high risk)

	1	2	3	4	5
Risk of a major accidental collision in space	( )	( )	( )	( )	(●)
Risk of Kessler effect*	( )	( )	( )	( )	(●)
Risk of outage of essential space based services	( )	( )	( )	(●)	( )
Risk of casualty (on-ground) of re-entering space debris	( )	(●)	( )	( )	( )
Risk to aircraft in flight from re-entering space debris	(●)	( )	( )	( )	( )
Risk to astronauts in orbit (from debris hitting the space station)	( )	( )	(●)	( )	( )

**Phenomenon where the increasing density of space debris in low Earth orbit (LEO) can trigger a chain reaction of collisions, generating more debris and posing a growing threat to the future usability of LEO.*

8. In your opinion, and/or experience, are the current international space laws fit to ensure the safe and long-term use of space?

- ( ) Yes
- (●) No
- ( ) Somewhat
- ( ) No opinion

Can you explain the reason behind your answer?

The current body of law was adapted to the specific context of the Space Race in the second half of the 20th century. Now that the nature of the players, activities and issues involved has changed radically, the international space laws need to evolve, particularly to take better account of the privatisation of the space sector, the massification of its activities and the scale of its political, economic and environmental impact on humanity.

UNOOSA itself admits that current international space laws are not adapted to the long-term viability of space activities, and that specific legal rules need to be established.

We deplore the fact that all the "good practices" that are supposed to guarantee the safe and long-term use of space are based solely on the goodwill of the players involved and are therefore only optional. Adopting responsible behaviour in orbit and strategies to drastically reduce environmental impact should not be an option, but an imperative.

Failure to comply with this imperative should be punished by an authority competent to hear cases, pronounce sentences and enforce them regardless of the country or nationality of the offender.

Such an international jurisdiction is perhaps the stuff of science fiction insofar as an international consensus on this issue seems unattainable given the geopolitical context. Nevertheless, a European regulation banning practices that threaten the long-term use of space is within our grasp. Regulation (EU) 2023/1115 now bans access to the European market for raw materials that have contributed to deforestation. Why not do the same with space services that have contributed to orbital congestion?

9. In your opinion, and/or experience, are the current national space laws fit to ensure the safe and long-term use of space?

- ○ Yes
- ◉ No
- ○ Somewhat
- ○ No opinion

Can you explain the reason behind your answer?

In the opinion of the NGO Cosmos for Humanity, current national laws are inadequate because they are essentially limited to three objectives:
- To enable states to comply with their licensing, registration, and monitoring obligations under Article VI of the Space Treaty.
- To organise risk management for space operations, to enable the burden of financial compensation to be shared with the private entity in the event of damage.
- Promote the country's space sector by exploiting the grey areas in the treaties, particularly on the issue of the exploitation of space resources.

Our observation is that very few countries have put in place binding national legislation on space operations, following the example of France and its LOS (law on space operations), and in this case generally content themselves with purely prescriptive provisions. It should be noted, however, that even in France and despite the LOS, as orbits are not considered part of the biosphere, some public actors refuse to recognize that outer space could be an environment that need to be protected (Decision of 15 April 2022, NGO Cosmos for Humanity vs Direction générale des finances publiques d'Ile de France et de Paris).

The main obstacle to the development of national legislation to protect access to space is based on two difficulties:
- It is not in the interest of any state to introduce mandatory measures that would apply only to its space industry, putting it at a disadvantage in the face of international competition that is not subject to the same constraints.
- It is not possible for a Member State to deny European players access to its national market, even on the grounds that their behaviour in orbit does not comply with basic space sustainability standards, or risk being penalised by the CJEU.

That's why we think this initiative for a European Space regulation is so timely. By making it possible to restrict access to the European market to actors that meet our expectations in terms of sustainability, European regulation would make it possible to ensure a radical change in European space practices, without handicapping the European space industry. This new European regulation would also make it possible to impose an 'environmental' concept of space in national law, so that environmental protection measures can also be applied to outer space. And, going a step further, that the European Union could interpret the space sector as falling within the scope of the 1998 Aarhus Convention.

10. In your opinion and/or experience, do the increased space activity calls for specific requirements and/or guidance for the safety of space?

- (●) Yes
- ( ) No
- ( ) Somewhat
- ( ) No opinion

Can you explain the reason behind your answer?

In terms of security in space, Cosmos for Humanity has two main concerns:
- Ban the destructive testing of anti-satellite capabilities in outer space (and support the work of the EOWG on reducing space threat).
- The introduction of substantial fines or even criminal measures against space companies that deliberately abandon satellites in orbit or make uncontrolled reentries.

Resilience-related questions

Resilience refers here to the capacity of space infrastructures and assets to maintain at all times their digital and physical integrity and functionality. Space infrastructures cover all space assets and systems across all relevant segments (ground, space, links, communication, user connections). The respective resilience measures and practices should aim to prevent, protect against, resist, respond to, mitigate, and recover from, events linked to digital/ICT risk and to physical security risk.

17. Do you agree that the digitalisation of space systems, the mixed structure of space infrastructures (ICT systems + physical assets) and their rather complex architecture (space segment, ground segment, link segment and user segments) create specific challenges for ensuring the resilience and the physical and digital security of the space infrastructures?

- Strongly Agree
- Agree
- Undecided
- Disagree
- Strongly Disagree

18. Please indicate what you consider to be the main resilience/security risk, on a range from 1 (low risk) to 5 (high risk) (to be rated individually and not against each other).

	1	2	3	4	5
There are difficulties in having systems/hardware replacement and repair for physical assets in space, once damaged or hacked					
The intrinsic complexity of the international supply chain relying on components from multiple manufacturers and sources not necessarily subject to software integrity controls or other types of supply chain checks					
The lack of tailored standardisation for the cybersecurity of the space infrastructures					
Low cyber protection or lack of update for the commercial off-the-shelf products used in satellites					
Other (please specify and rate)					

19. Today, space infrastructures support the provision of numerous services. Satellites enable services such as communication, navigation, Earth observation, weather monitoring. In your opinion and/or experience, do we need to collectively increase the overall level of cybersecurity and resilience of different space infrastructures (coherently for all segments and space assets) to ensure protection from cyber-attacks (on the ground segment and for on-boarded software) and different types of interferences (such as interception/jamming/spoofing)?

- Yes
- Somewhat
- No
- No opinion

20. In your opinion and/or experience, what are the most important or most urgent resilience /cybersecurity-related gaps / aspects that should be addressed (1 - not important/ not urgent - 5 very important/urgent) (to be rated individually and not against each other)

	1	2	3	4	5
Risk management measures for the identification of vulnerabilities, the detection and handling of incidents	○	○	○	○	○
Activation of business continuity protocols and recovery plans	○	○	○	○	○
Carrying out risk assessments	○	○	○	○	○
Identification of critical space assets	○	○	○	○	○
Enabling strong encryption protocols	○	○	○	○	○
Conducting different types of ICT testing	○	○	○	○	○
Putting in place strategies addressing risks in the space supply chain	○	○	○	○	○
Other (please specify and rate)	○	○	○	○	○

21. In your opinion and/or experience, are current cybersecurity/resilience legislative frameworks at the EU and national level (NIS2 and CER directives, future Cyber Resilience Act) fully fit to ensure the resilience of all space assets, systems and infrastructures, on all relevant segments and in a comprehensive manner?

- ○ Yes
- ○ No
- ○ No opinion

22. In your opinion and/or experience, do the increased risks to space infrastructures and spaces assets call for specific requirements, standards and/or guidance?

- ○ Yes
- ○ Somewhat
- ○ No
- ○ No opinion

26. What is your estimate of the costs for implementing cybersecurity and physical security standards?

Sustainability/environmental-related questions

Sustainability refers to the practice aimed at minimising the negative impacts of space operations on the Earth's environment for the entire life cycle of space activity. It involves creating a sector-specific methodology bases on the PEF method (Product Environmental Footprint Category Rules - PEFCR) to calculate the environmental footprint, including covering the data gaps, promoting research and development of missing characterisation models as well applying eco-design principles to space activities.

It also aims at minimising the negative impacts of space operations looking out from Earth (including light pollution).

27. Do you agree that, given the increased space activity, there is a need for a space sector common methodology to measure its environmental footprint on Earth and in-space?

- (●) Strongly Agree
- ( ) Agree
- ( ) Undecided
- ( ) Disagree
- ( ) Strongly Disagree

27.1 Please explain the reason behind your answer.

The NGO Cosmos for Humanity shares this view. In order to have a common methodology for all European players, we have developed, in partnership with the French space agency (CNES), an indicator that is positioned as the 'equivalent' of the carbon footprint for space pollution: the Outer Space Footprint (OSF) (see document attached at the end of the survey). Our vision of the OSF is in line with that of the label described in PO1 and PO2+.

In our view, this methodology should have the following characteristics:
- Be controlled by a European public body to ensure that there are no conflicts of interest with the OSF supervisors, and to ensure that the body in charge of the OSF defends European interests. Ideally, it should be managed either by EUSPA or by a European body dedicated to this task, such as EUOPA (European Union Agency for the Preservation of Orbits).
- Be designed to fit in with European regulations on sustainable finance (SFDR) and corporate sustainability reporting (CSRD), in particular by defining the notion of sustainable space activity within the meaning of the European taxonomy. This would create an economic incentive for sustainable operators and a reputational penalty for unsustainable operators by requiring them to document their space pollution.
- The body responsible for the OSF would also be entrusted with auditing environmental data relating to space, in accordance with the CSRD.
- Evaluate all space pollution by operators based on harmonised life cycle assesments at European level (in line with the Commission's consultation on the Transition pathway for a resilient, sustainable, and digital aerospace and defence industrial ecosystem).
- To produce an indicator or label that is also aimed at companies outside the space sector and European citizens, to enable them to act at their own level by encouraging responsible operators.

From the same point of view, the Space Sustainability Rating (SSR) does not seem to us to be a feasible solution in the context of PO1 and PO2+ :
- The SSR is controlled by a non-European body, mainly funded and controlled by Europe's main space competitor.
- It is calculated mainly on the basis of self-assessment.
- It does not assess the environmental footprint but the 'sustainability' of a mission.
- It is an aggregate score that will very probably be illegal under future European regulations on green claims. The fact that the organisation in charge is non-European will also act as a brake.
- The SSR certification process does not guarantee the independence of the certification body.
- The SSR is a sector label that is only intended for space industry operators.

In view of the abuses of the MSC label, do we really need to repeat the experience in the space sector to understand that this model is as outdated as international space laws?

27.2 In your opinion and/or experience, what are the most important aspects of space activities that should be measured to identify its environmental footprint?

The Outer Space Footprint (OSF) takes five factors into account:
- The creation of space debris and the interferences with in-orbit traffic
- Light pollution
- Gases and particles affecting the climate and the ozone layer
- Pollution on the ground and in the oceans.
- For satellite operators, the integration of the OSF of the launcher used, in proportion to the payload.

30. Do you agree that the increased number of satellites in orbit negatively impacts astronomy?

- (●) Strongly Agree
- ( ) Agree
- ( ) Undecided
- ( ) Disagree
- ( ) Strongly Disagree

31. In your opinion and/or experience, what would be the most useful measures to protect dark and quiet skies?

Cost category 5: Opportunity costs of light pollution on astronomy

Examples of costs we have identified under this category include: cost related to measures to reduce light pollution (i.e. choice of material), measures to reduce radio interference with astronomy, modification of flight routes, robustness of electronic receivers)

32. What would be the impact of including measures that limit light and radio pollution in your space activities?

(Quantitative or qualitative estimates)

Questions for safety, security/resilience, sustainability (in orbit and on Earth)

33. Can you think of potential benefits or disadvantages of having a non-binding system (Policy Option 1)? Please rate the below on a scale from 1 to 5 (1 strongly disagree- 5 strongly agree)

	1	2	3	4	5
Non-binding measures provides flexibility for the industry solutions to adapt new technological developments	( )	(●)	( )	( )	( )
Non-binding rules provides less legal clarity	( )	( )	( )	( )	(●)
Non-binding rules lead to a lack of long-term commitments	( )	( )	( )	( )	(●)

Safety, resilience/security and sustainability measures can limit revenue producing activities and therefore non-binding measures will not be sufficient	○	○	○	○	◉
A label certifying compliance to certain non-binding measures would reduce “green-washing” and could incentivise behavioural change	○	◉	○	○	○

34. In your opinion and/or experience, how could adherence to space safety, resilience/security and sustainability standards best be incentivised?

By giving the public a better understanding of the environmental consequences of space activities, so that operators' performance is no longer assessed solely from an economic point of view.

From Cosmos for Humanity's point of view, the main incentive would be to make the actors furthest downstream, i.e. companies outside the space sector and citizens, aware of their own responsibility in terms of space sustainability. It is in their hands that the most effective political and economic leverage lies to achieve a pivot towards sustainable space activities. We can only welcome the fact that consumers are now aware that they are in the front line in the fight against child labour, deforestation, climate change and overfishing. We believe the same should apply to preserving access to space.

In practice, the ideal scenario would be as follows:
- Consumers question the extra-atmospheric impact of their consumption choices.
- They ask suppliers of European products and services to provide more information about their suppliers of space data. For example: "Did this coffee pod manufacturer, which needed satellite imagery to prove its compliance with European regulations on deforestation, use a responsible operator?
- This trend has been amplified by the systematic display of the OSF, alongside the energy performance index, on products and services sold on the European market.
- To avoid a poor environmental image, European companies prefer to use operators with a good OSF.
- If OSF is included in the green taxonomy, sustainable space operators will benefit from massive financial investment from "Article 9 funds".
- Sustainable space operators, although offering less economically efficient solutions because of the constraints they impose on themselves (PO1) or are imposed on them (PO2+), are becoming more competitive than non-sustainable operators, leading the European space industry to pivot towards sustainable space activities.
- With access to the European market gradually being denied, de facto or de jure, to non-responsible space operators, non-European operators will be forced to comply with European environmental concerns. These concerns, like those of the US in the fight against terrorism, corruption, and money laundering, will make it possible to defend the EU's position before the WTO if it is accused of violating free trade rules.

35. Can you think of potential benefits or disadvantages of having an EU legislative act on the safe, resilient/secure and sustainable use of space (Policy Option 2)? Please rate the below on a scale from 1 to 5 (1 strongly disagree - 5 strongly agree)

	1	2	3	4	5
The EU Space Law would provide a common, stable and predictable framework to foster the further expansion and long-term sustainability of activities of new commercial space actors, as well as attract private investment.	○	○	○	○	◉

Having common binding rules would ensure that the most virtuous operators are not penalised	○	○	○	○	◉
The EU Space Law could create an equal level playing field for all European companies	○	○	○	○	◉
The cost for the EU Space Law would be burdensome for space operators	○	○	○	○	◉
Binding license requirements for satellite operators needs to include supportive measures for the space industry (i.e. supporting research and innovation)	○	○	○	○	◉
The EU Space Law would enable the EU to be a global standard setter in space safety, security and sustainability	○	○	○	○	◉
The EU Space Law would enable the use of sustainable space materials and processes, by understanding what supports a sustainable space activity	○	○	○	○	◉
The EU Space Law would de-crease the risk of operators cherry picking the Member States with the least safety, security and sustainability requirements	○	○	○	○	◉

36. Can you think of potential benefits or disadvantages of bi-lateral agreement on the safe, resilient /secure and sustainable use of space (Policy Option 3)? Please rate the below on a scale from 1 to 5 (1 strongly disagree – 5 strongly agree)

	Answer 1	Answer 2	Answer 3	Answer 4	Answer 5	Answer 6
Considering the globally interconnected space ecosystem, additional action by a larger number of international actors would strengthen the overall protection of the environment in orbit and on Earth	○	○	○	○	◉	○
Carrying out more life cycle assessments of space activities following the same methodology, would allow to collect more data and facilitate a collective effort of the space ecosystem to reduce its environmental impacts	○	○	○	○	◉	○
Due to diverging views and priorities, the challenge of an international approach is that it risks leading to more high-level requirements as a compromise solution, given the intricate	○	◉	○	○	○	○

dynamics of international deliberations						
the bilateral agreements would only be concluded with some (potentially like-minded) countries, whereas there will still be places outside these countries where companies might be incentivised to launch from, due to potentially lower standards	○	○	○	◉	○	○
A multiplication of bilateral agreements will create legal uncertainties for operators	○	○	○	◉	○	○

Effectiveness of the policy options

40. To what extent would the Policy Options help in achieving the following objective compared to no action being taken?
Please score them from -3 to + 3, considering that scores from -3 to -1 represent these options being less effective than the current status (or not taking additional action) and scores from +1 to +3 represent these options being better than the current situation in helping achieve the set objectives.

General Objective: ensure a safe, secure and sustainable use of space and increase the protection and resilience of all space systems, services, and operations in the EU

Scenario	From -3 to 3	Rationale
Policy Option 1	1	- The absence of binding rules means that the space sector cannot be guaranteed a minimum level of sustainability. If the incentives, both positive and negative, are insufficient, this strategy risks being ineffective. By externalising the management of the label(s) to bodies over which they have only limited control, the Commission and the Member States run the risk of seeing the PO1 strategy distorted.
Policy Option 2	2	+ By establishing binding rules through a regulation, rather than a directive, the EU can ensure that these rules are applied uniformly across Europe. These binding rules help to ensure a minimum level of spatial sustainability. EU Space regulation can work in synergy with SFRD, CSRD and green taxonomy, creating a set of positive and negative incentives. - By limiting itself to binding rules, PO2 risks not developing sufficient incentives and stifling the European space industry. In the absence of indicators, citizens and companies outside the field are left out of the equation, even though they are one of the main levers for action.
Policy Option 2+	3	see question 41
Policy Option 3	1	+ This is an opportunity for Europe to disseminate its space sustainability standards and make them a new international standard. -

		There is a risk that these bilateral agreements will result in allowing certain non-European operators to benefit from exemptions that will give them an advantage over European operators.

41. What is your preferred Policy Option? Why?

Cosmos for Humanity welcomes the quality of the preparatory work submitted for consultation.

We were pleased to note the European Commission's willingness to tackle the issues of sustainability in space head on, while highlighting the continuum that links them to sovereignty issues. As the UK Space Agency, and in particular its Scottish space ecosystem, has rightly noted, the challenges of space sustainability are not a constraint, but rather an opportunity to make the space industry more efficient, more competitive and more resilient. This is all the more true for the European Union, which has two considerable advantages - its single market and its legal framework - which allow it to envisage binding rules and a high level of requirements for European industry. This is something that other regional or international organisations are unable or unwilling to do.

From our point of view, PO2+ is the most appropriate solution, as it allows us to get the most of PO1 and PO2. On the condition, however, that it does not represent a trade-off, but rather an optimisation of the two options. We therefore have a couple of caveats:

- The binding rules should be ambitious, whether under PO2 or PO2+. The fact that PO2+ makes it possible to reward the most committed actors must not lead to a downward levelling of requirements compared with OP2 to artificially allow room for progress. It seems imperative that PO2+ should have the same high standards as PO2, the only difference being that a label is established at the top.
- The "label" in question should not be a label, but an indicator along the lines of the European energy performance index. The problem with a label is that it imposes a binary response, "compliant or not compliant", where there is a need for nuance. On the one hand, to enable standards in terms of space sustainability to be gradually raised and to prevent the space industry from “resting on its laurels”. And on the other hand, because it does not allow us to highlight bad actors. An operator that does not have the label is not required to communicate the fact that it does not have it. However, if it is an indicator, and that its display is mandatory, non-sustainable operators will be required to disclose their irresponsible behaviour (passive name and shame system). This has a multiplied impact if, as C4H recommends with the OSF, downstream operators inherit the poor rating of their upstream data supplier. Conversely, with an indicator, the most ambitious operators have an interest in continuing to improve in order to obtain the best score, whereas labels create an incentive to be lazy once the threshold for obtaining a score has been reached.
- Aggregate score labels are greenwashing tools and will most likely be considered illegal under future European regulations on ecological claims. An indicator can avoid this difficulty by clearly and unambiguously displaying the different aspects and parameters of the environmental footprint of space operators, where labels do not allow for this nuance.
- The indicator should be created, not for the space industry, but in such a way that it can be understood by consumers and companies outside the space sector, so that they can appropriate it and use it as a means of communication.
- For reasons of sovereignty and independence, the body responsible for managing the indicator should be a body controlled at European level, and not at national level, to ensure that the rules and controls are carried out in a uniform way that respects European interests. Our thoughts on a "European Union agency for the preservation of orbits" are along these lines.
- From the outset, the regulations and the indicator should provide for their integration into the SFDR and determine what constitutes a sustainable space activity in terms of the European taxonomy. Sustainable space activities are defined in such a way as to constitute the upper range of the indicator.- The work on this new EU regulation should provide an opportunity to amend the taxonomy regulation to make the protection of orbits and access to space the 7th environmental objective of the European Union.
- From the outset, the regulations and the indicator should foresee their integration into the SFDR and determine what constitutes a sustainable space activity according to the European taxonomy. Sustainable

space activities should be defined in such a way as to constitute the upper range of the indicator.
- The work on this new EU Space regulation should provide an opportunity to amend the taxonomy regulation to make the protection of orbits and access to space the 7th environmental objective of the European Union.

Final questions

42. Would you be willing to be contacted in the future for further questions/clarifications through the email address submitted above?

- (●) Yes
- ( ) No

43. Please provide any further information that you believe could be useful

Please find attached (43.1) our NGO's proposal for ESA's "Space 4 sustaianbility award" in 2023. It explains how the OSF works in a one-page description.

This competition was very interesting for C4H to understand that ESA was not the appropriate interlocutor for our proposal. That's also why we were pleased, but not so surprised, to discover this DEFIS survey on a future EU Space law.

43.1 Or upload a document here

2349fd9a-9508-4201-ae55-e4e1a9cde3db/ESA-EISC-2023-Sustainability-Award_Poster_C4H_.pdf

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**For a short description of the policy options, please see the document below*

Policy Options

Policy_Options.pdf

Privacy Statement

PRIVACY_STATEMENT_TARGETED_CONSULTATION_EUSL_.pdf

Contact

defis-b2@ec.europa.eu