Abreu advogados

Date: 24th November 2025

To: Agência Espacial Portuguesa

and the European Commission, Directorate-General for Defence Industry and Space.

Subject: Response to Public Consultation on the Proposed EU Space Act (COM(2025) 335 final)

Dear Members of the Portuguese Space Agency and the European Commission,

Whilst we welcome the Commission's ambition to enhance the safety, resilience, and competitiveness of Europe's space ecosystem, we respectfully submit that certain provisions of the proposed Regulation require refinement to ensure they achieve their objectives without undermining the very competitiveness they seek to protect.

This Opinion was prepared following technical expert sessions conducted in collaboration with **Ilex Space** (a consultancy company specialised in space markets), **Atlantic Spaceport Consortium** (a company developing and operating a spaceport in the Azores, Portugal), **Weather Stream** (an operator launching a fleet of satellites with microwave sensors), **Optimal Structural Solutions** (a supplier of composite components and structural elements for satellites, launchers and other space infrastructure), and **Space Forge** (a company manufacturing materials in space, operating its own fleet of satellites that re-enter with their products). This submission presents a common view on the current draft.

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I. EXECUTIVE SUMMARY:

The COM (2025) 335 final Proposal seeks to create an internal market framework for space services and space-based data by harmonising key aspects of authorisation, registration, safety, resilience (including cybersecurity) and environmental sustainability, whilst establishing governance and enforcement mechanisms. It relies on Article 114 TFEU to address single-market fragmentation through targeted harmonisation and mutual recognition, whilst allowing objectively necessary stricter measures for operations or launches in a host Member State, creating potential tensions with harmonisation objectives.

In reviewing the Proposed EU Space Act (COM (2025) 335 final), we have identified the following topics requiring attention and addressing by the European Commission:

a. Variability within Definitions
b. Dissonance with Member States' Prior Legislative Pathways
c. Free Movement and Host-State Stricter Measures
d. Qualified Technical Bodies
e. Authorisation Timeline
f. Market Access, Competitive Neutrality and Third-Country Reciprocity
g. Applicability of NIS2 Directive, CER Directive and Telecoms EU Law
h. Cybersecurity/Technical Requirements
i. Environmental Footprint (EF/PEFCR-Space)
j. Transitional Arrangements

These topics represent competitive disadvantages for EU market actors, arising from three converging factors: (i) cumulative regulatory burdens; (ii) extended and

unpredictable authorisation timelines; and (iii) asymmetrical treatment between EU Member States and between EU operators and third-country operators.

We therefore strongly recommend shifting from an operator-oriented licensing model to an operation-oriented model, or provide legal certainty that is indeed the intention, in line with international practice and Member State legislation.

Our Recommendations seek to (i) align the Proposal with existing national frameworks; (ii) ensure regulatory coherence with the UN space treaties; (iii) offer legal certainty to operators; (iv) prevent double licensing obligations; and (v) reduce administrative burdens.

Below is a Priority Table containing our most urgent Recommendations:

Topic	Recommendation	Urgency
Variability within Definitions	Align the concepts of "space services", "operators" and "Union space operators" to eliminate interpretative gaps	Priority
Dissonance with Member States' Prior Legislative Pathways	Consider refocusing on operation/object-based authorisation/ justify benefits versus operation-oriented licensing given international object responsibility and clarify consequences of the property or control over objects/assets changing operators	Priority
Qualified Technical Bodies	Avoid creation of QTBs; instead empower national competent authorities (NCAs) with in-house capability and common assessment templates to reduce divergence. whenever QTBs remain, require a harmonised handbook and peer review under EC/Agency coordination to ensure consistent application across Member States.	Priority
Authorisation Timelines	Set a three-month maximum with simplified templates, common forms and mutual recognition of validated data	Priority
Reciprocity and Equivalence	Embed reciprocity criteria in equivalence decisions to ensure level playing field, as reciprocity is absent from Title V of the EU Space Act.	Priority
Technical Requirements	Implement proportionate, risk-based obligations rather than size-based requirements, with EU co-funding support for smaller operators and shared cybersecurity tools.	Priority

Enacting the adjustments above will assist in providing a stable, predictable, competitive regulatory ecosystem, avoiding potential asymmetries in compliance obligations between EU and third-country operators.

Below is a detailed description of our review and concerns, including context, background and support for our Recommendations. At the end you may find a complete table with all our Recommendations priority level.

The EU Space Act represents a landmark initiative to harmonise space sector regulation across the Union. **With targeted refinements on definitions, licensing model, timelines, reciprocity, cybersecurity alignment and EF methodology, the Regulation can achieve its objectives of safety, resilience and sustainability whilst preserving competitiveness and legal certainty for European space operators.**

II. REVIEW

A. GLOBAL REMARKS

A.1. Legal Uncertainty due to Variability within Definitions

Legal uncertainty arises from overlapping and internally inconsistent terms of art, used interchangeably. These create risk of confusion, as the current definitions may be perceived as contradictory, leading to multiple interpretations.

The EU Space Act aims to regulate the "space-based data" market and the provision of "space services" in the Union (Article 1) with the goal of creating "a stable, **predictable** and competitive business environment." A coherent and neutral taxonomy would support legal certainty and harmonized implementation across the Union.

The following definitions contained in Article 5 create interpretative challenges:

- **"Space activities"** [article 5(13)] include operation and control of space objects, launch services, including launch attempts, operation and maintenance of launch sites and facilities, exploration of outer space, use and management of space objects in outer space, such as in-space operations and services (ISOS), and the monitoring and disposal of space debris.
- **"Space services"** [article 5(14)] include operation and control of space objects, launch services, operation and maintenance of launch sites and facilities, primary providers of space-based data services, in-orbit servicing and collision avoidance.

- **"Space operator"** [article 5(16)] is an entity operating space infrastructure by carrying out defined space services.
- **"Union space operator"** [article 5(17)] is a space operator established or controlled in the Union.
- **"Primary providers of space-based data"** [article 5(22)] initiate the first processing of space-based data enabling further provision.
- **"Space-based data"** [article 5(12)] is broadly defined as "data received from outer space" with non-exhaustive examples.

The table attached as **Annex I** illustrates the interplay among these concepts, and how they overlap and diverge.

Key concerns:

1. The obligation to obtain authorization under Article 6(1) of the EU Space Act is triggered for "Union space operators"; therefore, activities such as debris monitoring/disposal and exploration do not clearly trigger the need to obtain authorization despite operational risks.
2. URSO registration requirements create inconsistent coverage. Although article 24(2) mentions a "consolidated list of all space service providers", article 24(1) orders only the registration of "Union space operators" (not "space service providers"). This creates a situation where **three categories of space market actors are not registered in URSO**: (i) collision avoidance services providers, (ii) primary providers of space-based data, and (iii) operators of space infrastructure who are not spacecraft operators, launch operators, launch site operators or ISOS providers.
3. The European Commission is silent regarding how providers of telecoms

services resorting to space objects for network or data transmission are expected to coordinate compliance with EUSA and already existing telecoms regulations (namely, the Directives 98/84/CE, 2002/77/CE and (UE) 2018/1972). Suspension of telecommunications licensing and replacement with a space-based data provider license, and implementation of additional licenses are two alternative, incompatible constructions under the EU Space Act.

4. Article 2 is silent regarding "secondary" providers of space-based data - i.e., all those actors who either: i) perform subsequent processing of data received from outer space (after a primary-space provider has initiated the first processing of space-based data); or ii) initiate the first processing of space-based data but the processing operations performed are not sufficient to enable any subsequent provision. These "secondary" operators are not subject to EUSA, yet free-movement wording may be construed to cover them (because, by definition, "space services" already includes primary providers, the additional reference to space-based data services providers may be construed to cover those secondary providers).

Recommendation: Align the concepts of "space services", "operators" and "Union space operators" to eliminate interpretative gaps; clarify treatment and registration status of collision avoidance providers, primary providers and residual operators; clarify lex specialis application vis-à-vis telecoms regulations (replacement versus complementary); clarify scope coverage of "secondary" data providers.

A.2. Lack of Harmonisation due to Dissonance with Member States' Prior Legislative Pathways

- The focus of Article 6(1) imposes on (some) space market actors the obligation

to obtain an authorisation at *operator* level, diverging from the operation/object-based systems implemented in multiple Member-States, such as Portugal, Spain, France, and Germany.

- This focus of Article 6(1) on the act of licensing operat*ors* instead of operat*ions* is clear in Article 6(3), according to which operators are required **to obtain a license in their Member State of incorporation and, additionally, subsequent licenses before each Member States from which they intend to provide services** or operations – hence the **EU Space Act creating a dual licensing requirement**.

Key concerns:

1. A dual licensing scheme **unjustifiably burdens Union market actors and hinders the functioning of the internal market**.
    - First, operation/object-based systems implemented in these Member States (e.g., Portugal's single/global/joint licences and object registry under Decree-Law no. 16/2019) ties to compliance with international obligations:
        - Under international law, international responsibility and registration focus on space objects by virtue of the Outer Space Treaty and the Registration Convention, under which States bear responsibility for space activities of nationally licensed companies and launching states are liable for damages caused by the objects launched by them.
    - Second, operator licenses are unnecessary under the international framework for outer space and merely create obstacles to access to the market.

2. Moreover, where Member States introduce an additional preliminary licensing for space operators as defined under the EU Space Act, launch operators, for instance, would require both a "launch operator" licence under EUSA and individual "launch" licences for each object, but collision avoidance services providers (who are not "operators") would be subject only to an operator license, **creating unjustified discrimination in treatment of market operators**.
3. Finally, implementing an operator-oriented licensing scheme raises questions about the consequences of the property or control over objects/assets changing operators. What happens if operators intend to change control and enjoyment of an object/asset contractually? Are the acquirors required to obtain new operator authorisation and submit new technical files? Are the sellers required to submit for a new authorisation to remove the object/asset from their operator registry? If not, what stops operators from using assets different from those described in the technical file? Can operators remain registered without any object associated to them?

Recommendation: Replace licensing of operators with licensing of operations, which would be more aligned with procedures already existing in Member States' domestic laws and the applicable international framework whilst still enabling an EU-level operator registry fed by operation authorisations.

A new article 6(1) could limit provision of space services to operators having obtained a license to perform a space operation in a Member-State, enabling registry of all operators while confirming at supranational level the solution of most Member-States.

Alternatively, justify benefits of operator-licensing *vis-a-vis* operation-oriented licensing given international object responsibility, and clarify consequences of the property or control over objects/assets changing operators.

B. SPECIFIC REMARKS

B.1 Free Movement and Host-State Stricter Measures

Article 3(2) permits host-state stricter requirements where "objectively necessary" for safety, resilience or environmental sustainability. As the concept of "objective necessity" is not defined, Member States shall be free to interpret this clause. Indeterminate concepts harm harmonization and the internal market by preventing coherent, shared understanding necessary for legal and administrative cohesion.

Ambiguity originating in lack of harmonization may create a material risk of divergent national interpretations, market fragmentation, and regulatory arbitrage.

For instance, a satellite operator licensed in Portugal could face different substantive obligations when operating from French Guiana, Germany, or Italy.

Recommendation: Define "objective necessity" and material criteria (risk categories, orbit/mission criticality, evidence standards) to avoid inconsistent barriers and licence shopping. Consider establishing Commission guidance or delegated acts specifying permissible grounds for stricter measures.

B.2 Multiplication of Regulators: Qualified Technical Bodies

Qualified technical bodies ('QTB') involvement creates an additional layer of regulators who will develop their own requirements, methodologies and check routines. Market actors will be forced to observe and comply with this additional layer of regulation for potentially each jurisdiction they intend to operate in, leading to increased costs and hindering market fluidity. For example, Portuguese, French and German qualified technical bodies may all have different understandings of documentation required to support environmental footprint claims.

Recommendation: Remove references to QTBs. Instead, empower national competent authorities (NCAs) with in-house capability and common assessment templates to reduce divergence. Whenever QTBs remain, require a harmonised handbook and peer review under EC/Agency coordination to ensure consistent application across Member States.

B.3 Impact of Authorisation Period on Operational Timelines

Up to 12 months for national authorisations (suspendable) and 8 months for Union-owned assets contrast sharply with faster national regimes (Portugal's 90-day timeline, UK's 6 months, France's 5 months). The ripple effect of extended deadlines can cascade through various layers of space project implementation, causing delays and increased costs. When domestic industry is accustomed to Administration providing final decisions within 3 months, extending to 12 months may be perceived as an institutional and regulatory setback.

Recommendation: Reduce maximum decision periods to three months with "clock stop" guardrails for incomplete applications. Adopt mutual recognition of validated dossiers and standard forms to streamline cross-border operations and reduce administrative burden. Create dedicated national or EU-level contact points with clear guidance materials and simplified authorisation templates for low-risk profiles.

B.4 Market Access, Competitive Neutrality and Third-Country Reciprocity

Third-country operators obtain centralised URSO registration within five months through a streamlined process that may be both simpler and quicker than the dual licensing process most domestic space operators will likely endure. For example, a US-

based company may apply directly with the Agency for primary space-based data services and receive a decision within five months, while a Portuguese provider faces up to 12 months for operator licensing plus additional time for operation licenses.

The absence of reciprocity requirements in equivalence decisions creates a structural disadvantage for EU operators, who must comply with both EU Space Act and third-country requirements, while foreign operators benefit from streamlined access to the EU market.

We recommend incorporating explicit reciprocity conditions. Protecting domestic industries and enhancing European security through reciprocity demands should be high EU priorities.

Recommendation: Embed reciprocity criteria in equivalence decisions to ensure level playing field, as reciprocity is absent from Title V of the EU Space Act. Entrust third-country authorisations to Member States to preserve parity and avoid creating competitive advantages for non-EU operators.

B.5 Regulatory Overlap (NIS2/CER)

The EU Space Act is a *sector-specific Union legal acts* under Article 4 of Directive (EU) 2022/2555 of the European Parliament and of the Council of 14 December 2022 ("NIS 2 Directive") (Article 75(1) of the EU Space Act).

Under Article 4(1) of the NIS 2 Directive, its obligations are non-applicable to operators covered by sector-specific Union legal acts. Yet, Article 75(2) of the EU Space Act determines complementary application where Union space operators are identified as critical entities under the NIS 2 Directive. Clarification is required.

Recommendation: Clarify *lex specialis* application vis-à-vis NIS2 Directive (replacement

versus complementary), by establishing clear delineation of responsibilities between space-specific and horizontal cybersecurity/resilience frameworks. Clarify precedence, single-window reporting, and supervisory coordination (EUSRN/CSIRTs) to reduce duplication.

B.6 Cybersecurity/Technical Requirements

While indeterminacy is generally harmful when it occurs in legal terms, technical requirements and sector-specific obligations typically work best when the legislator focuses on the functions/abilities intended by the addressee instead on the actual technical processes and methods adopted.

Overly detailed Annexes crystalized in acts enacted under the traditional EU ordinary legislative procedure (which is well-known for its high consumption of political, human and economic resources) risk becoming obsolete shortly after enactment and/or stifling innovation and the switch to better practices or standards prepared/discovered by competing markets.

Recommendation: Delete references to overly technically-detailed Annexes and rely on widely recognised ISO or ESA definitions and standards for clarity. Implement proportionate, risk-based obligations rather than size-based requirements, with EU co-funding support for smaller operators and shared cybersecurity tools.

B.7 Environmental Footprint (EF/PEFCR-Space)

EF calculation under Article 96 lacks a defined applicable methodology, with standardization still under development via Horizon Europe PEFCR-Space. Without standardization of environmental footprint calculation methods, operators are

exposed to arbitrary enforcement and inconsistent national interpretations.

The regulation places disproportionate responsibility on space operators for their entire supply chain, requiring operators to obtain environmental footprint data from all suppliers even when suppliers cannot provide such data. For example, a Portuguese satellite manufacturer relying on international suppliers would be held responsible for obtaining environmental footprint data from suppliers who may lack capacity or willingness to provide such information.

Recommendation: Phase EF obligations with PEFCR-Space availability, introduce proportionate supplier data tiers based on type and size of supplier, and provide Commission-backed tooling and funding to support compliance, particularly for SMEs and new entrants. EF data gathering should be calibrated to avoid placing disproportionate responsibility on operators for supply chain gaps beyond their control.

B.8 Transitional Arrangements

A single application date (1 January 2030) with numerous future implementing and delegated acts risks readiness gaps. Given the absence of mature standards, technical criteria, and national capacity, the proposed entry into force is the proposed entry into force is incompatible with the current maturity of national regulatory standards. A phased implementation would prevent regulatory discontinuity, disruption of ongoing or planned missions, and legal uncertainty.

Recommendation: Index application dates to chapters with phased and flexible implementation timeline, provide mission-phase-specific grandfathering for ongoing missions, and align with standards/implementing acts maturity.

B.9 Financial Support and Protection of Investment

Union operators may be placed at a disadvantage compared with operators from outside the Union due to complex licensing requirements, entailing administrative and counsel costs otherwise not present.

Competitive disadvantages arise from three converging factors throughout the EU Space Act: (i) cumulative regulatory burdens; (ii) extended and unpredictable authorisation timelines; and (iii) asymmetrical treatment of EU versus third-country operators.

Additionally, SMEs make up a significant portion of the space sector. For these undertakings, these burdens weight heavier: small-sized work force and staff, limited funding and hardship in grant-obtaining are but a few of the difficulties these actors face when accessing the space market.

Recommendation: Financial instruments must be timely, sufficient, and prioritised for scaling companies. Create specific instruments and budgets to support companies during transition with risk-based categorisation of space systems for tailored obligations.

III. RECOMMENDATIONS

1. Clarifications for Legal Certainty

- Align the concepts of "space services", "operators" and "Union space operators" to eliminate interpretative gaps.
- Clarify treatment and registration status of collision avoidance providers, primary providers and residual operators.
- Clarify *lex specialis* application vis-à-vis telecoms regulations, and the NIS2

Directive (replacement versus complement).

- Define scope coverage of "secondary" data providers.

2. Amendments for Harmonisation and Simplification (Alignment with Member-States)

- Consider refocusing on operation/object-based authorisation to align with Member State practice and international law, whilst enabling an EU-level operator registry fed by operation authorisations. A new article 6(1) could limit provision of space services to operators having obtained a license to perform a space operation in a Member-State, enabling registry of all operators while confirming at supranational level the solution of most Member-States.
- Alternatively, justify benefits versus operation-oriented licensing given international object responsibility and clarify consequences of the property or control over objects/assets changing operators.

3. Specific Measures

- **Free Movement:** Define "objective necessity" and material criteria (risk categories, orbit/mission criticality, evidence standards) to avoid inconsistent barriers and licence shopping. Consider establishing Commission guidance or delegated acts specifying permissible grounds for stricter measures.

- **Multiplication of Regulators:** Remove references to QTBs. Instead, empower national competent authorities (NCAs) with in-house capability and common assessment templates to reduce divergence. Whenever QTBs remain, require a harmonised handbook and peer review under EC/Agency coordination to

ensure consistent application across Member States.

- **Authorisation and Timelines:** Reduce maximum decision periods to three months with "clock stop" guardrails for incomplete applications. Adopt mutual recognition of validated dossiers and standard forms to streamline cross-border operations and reduce administrative burden. Create dedicated national or EU-level contact points with clear guidance materials and simplified authorisation templates for low-risk profiles. Implement integrated approach based on common forms and mutual recognition of data already validated at national level to minimise administrative burden. Exempt SMEs from fees.

- **Reciprocity and Equivalence:** Condition equivalence on reciprocity and clear supervisory cooperation to protect Union industry. Entrust third-country authorisations to Member States to preserve parity and avoid creating competitive advantages for non-EU operators.

- **Regulatory Overlap (NIS2/CER):** Clarify *lex specialis* application vis-à-vis NIS2 Directive (replacement versus complementary), by establishing clear delineation of responsibilities between space-specific and horizontal cybersecurity/resilience frameworks. Clarify precedence, single-window reporting, and supervisory coordination (EUSRN/CSIRTs) to reduce duplication.

- **Cybersecurity/Technical Requirements:** Delete references to overly technically-detailed Annexes and rely on widely recognised ISO or ESA definitions and standards for clarity. Implement proportionate, risk-based obligations rather than size-based requirements, with EU co-funding support

for smaller operators and shared cybersecurity tools. Phase EF obligations with PEFCR-Space availability, introduce proportionate supplier data tiers based on type and size of supplier, and provide Commission-backed tooling and funding to support compliance, particularly for SMEs and new entrants. EF data gathering should be calibrated to avoid placing disproportionate responsibility on operators for supply chain gaps beyond their control.

- **Transition Support:** Phase obligations with clear transitional periods recognising different implementation timelines, provide dedicated funding prioritised for scaling companies delivered directly to cover justified compliance expenses, and categorise systems by risk to tailor obligations appropriately. Stagger application dates by chapter with phased and flexible implementation timeline, provide mission-phase-specific grandfathering for ongoing missions, and align with standards/implementing acts maturity.

- **Financial Support and Protection of Investment:** Financial instruments must be timely, sufficient, and prioritised for scaling companies. Create specific instruments and budgets to support companies during transition with risk-based categorisation of space systems for tailored obligations.

4. Priority Assessment

The Table annexed as **Annex II** contains our Recommendations, organized by topic and furnished with a priority level.

Each Recommendation is rated a priority level based on the urgency of its addressing by the Institutions and their relevance to the Proposal:

Priority	Requires immediate consideration; concerns the core of the Proposal and/or Proposal's divergences with Member-States national laws.'
High	Requires next-action consideration; concerns the architecture of the Proposal and/or its applicability in practice and coordination with EU interests or Law.
Medium	Requires further consideration; concerns the peripheral scope of the Regulation and coordination with EU interests and Member-States national laws.

IV. CONCLUDING REMARKS

The EU Space Act represents a landmark initiative to harmonise space sector regulation across the Union. With targeted refinements on definitions, licensing model, timelines, reciprocity, cybersecurity alignment and EF methodology, the Regulation can achieve its objectives of safety, resilience and sustainability whilst preserving competitiveness and legal certainty for European space operators.

On behalf of Abreu Advogados Space & Satellites Team



Abreu advogados

[ANNEX I]

Union space operators - article 5(17)	Space Services – article 5(14)	Space activities – article 5(13)	Space Operator 5(16)	Primary providers of space-based data – article 5(22)
			(ii) "**operates the space infrastructure**"	
Spacecraft operators	(a) operation and control of a space object,	(a) operation and control of space objects, including for re-entry	(a) operation, control and return of a space object ('spacecraft operator');	(b) space services providers which ensure the **first processing observation data**
Launch Operators	(b) provision of launch services, as well as	(b) launch services, including launch attempts	(b) operation, control and monitoring of the launch process of a space object ('launch operator');	(b) space services providers which ensure the **first processing observation data**
Launch Site Operator	(b) provision of services of operation and maintenance of the launch sites, and, finally,	(c) operation and maintenance of launch sites and facilities	(c) operation, control and maintenance of facilities at the ground segment of space infrastructure used for the launch process ('launch site operator');	(b) space services providers which ensure the **first processing observation data**
	(c) any of the services provided by a **primary provider of space-based data**,			(b) space services providers which ensure the **first processing observation data**
		(d) activities in relation to the exploration of outer space, such as human spaceflight, space transport and conducting experiments, including of scientific nature, in outer space;		
ISOS provider	(d) in-space services and operations (ISOS)"	(e) activities in relation to the use and management of space objects in outer space, such as in-space operations and services (ISOS);	(d) operation and control of a space object for the purposes of provision of in-space operation and service, including to other space objects ('ISOS provider')".	
	(e) collision avoidance space services."			
		(f) operations that entail the **monitoring of space debris**;		
		(g) operations that entail the **disposal of space debris**;		
				(a) Providers of **electronic communications services**

[ANNEX II]

Topic	Recommendation	Urgency
Variability within Definitions	Define scope coverage of "secondary" data providers.	Medium
	Clarify treatment and registration status of collision avoidance providers, primary space-based data providers and residual operators.	Medium
	Align the concepts of "space services", "operators" and "Union space operators" to eliminate interpretative gaps	Priority
	Clarify *lex specialis* application vis-à-vis telecoms regulations, and the NIS2 Directive (replacement versus complement)	High
Dissonance with Member States' Prior Legislative Pathways	Consider refocusing on operation/object-based authorisation/ justify benefits versus operation-oriented licensing given international object responsibility and clarify consequences of the property or control over objects/assets changing operators	Priority
Free Movement	Define "objective necessity" and material criteria (risk categories, orbit/mission criticality, evidence standards) to avoid inconsistent barriers and licence shopping.	High
	Consider establishing Commission guidance or delegated acts specifying permissible grounds for stricter measures.	Medium
Qualified Technical Bodies	Eliminate reliance on QTBs; instead empower national competent authorities (NCAs) with in-house capability and common assessment templates to reduce divergence. Alternatively, whenever QTBs remain, require a harmonised handbook and peer review under EC/Agency coordination to ensure consistent application across Member States.	Priority
Auhtorisation Timelines	Set a three-month maximum with simplified templates, common forms and mutual recognition of validated data	Priority
	Adopt mutual recognition of validated dossiers and standard forms to streamline cross-border operations and reduce administrative burden	High
	Create dedicated national or EU-level contact points with clear guidance materials and simplified authorisation templates for low-risk profiles, that implement integrated approach based on common forms and mutual recognition of data already validated at national level to minimise administrative burden	Medium

	Guarantee no fees for SMEs.	Medium
Reciprocity and Equivalence	Condition equivalence on reciprocity and clear supervisory cooperation to protect Union industry.	High
	Embed reciprocity criteria in equivalence decisions to ensure level playing field, as reciprocity is absent from Title V of the EU Space Act.	Priority
	Align timeframes for EU versus third-country entry to prevent competitive disadvantage for Union operators.	High
	Entrust third-country authorisations to Member States to preserve parity and avoid creating competitive advantages for non-EU operators.	High
Overlap with EU Law	Clarify precedence, single-window reporting, and supervisory coordination (EUSRN/CSIRTs) to reduce duplication.	High
	Establish clear delineation of application between space-specific and horizontal cybersecurity/resilience frameworks.	High
Technical Requirements	Delete references to overly technically-detailed Annexes and rely on widely recognised ISO or ESA definitions and standards for clarity	Medium
	Implement proportionate, risk-based obligations rather than size-based requirements, with EU co-funding support for smaller operators and shared cybersecurity tools.	High
	Phase EF obligations with PEFCR-Space availability, introduce proportionate supplier data tiers based on type and size of supplier, and provide Commission-backed tooling and funding to support compliance, particularly for SMEs and new entrants	Medium
Transition Support	Phase obligations with clear transitional periods recognising different implementation timelines, and categorise systems by risk to tailor obligations appropriately. Provide mission-phase-specific grandfathering for ongoing missions, and align with standards/implementing acts maturity.	Medium
Financial Support and Protection of Investment	Financial instruments must be timely, sufficient, and prioritised for scaling companies. Create specific instruments and budgets to support companies during transition with risk-based categorisation of space systems for tailored obligations (e.g.: provide dedicated funding prioritised for scaling companies delivered directly to cover justified compliance expenses).	High