



Commercial Space Federation
Comments on the European Union Space Act
November 6, 2025

The Commercial Space Federation (CSF), the leading trade association for the commercial space industry, thanks you for the opportunity to comment on the proposed European Union Space Act (EUSA). As one of the largest markets in the world, with a storied heritage of space pioneering and innovation, Europe offers valuable opportunities for strategic partnerships in space. CSF member companies today provide a multitude of services to European customers including launch services, human spaceflight, and satellite-based services like remote sensing and communications. Many CSF member companies also rely on Europe for critical supply chain inputs, especially in the field of precision manufacturing.

CSF recognizes the European Commission's goals of developing a common rulebook across the Union and promoting space sustainability, safety, and security. CSF member companies share many of these same goals, and CSF has been a consistent advocate for the implementation of space safety best practices. However, CSF finds significant areas of concern with the proposed EUSA, which are detailed in this submission. CSF's goal is to ensure that the EUSA raises the bar for space safety without jeopardizing the many positive ways in which U.S. and EU space industries collaborate today.

The EUSA's proposed approach will create prescriptive standards, practices, and regulations that will stifle innovation and growth of the space industry in Europe and limit non-EU based industry's ability to compete in the European market. This will have negative consequences for Europe as nations seek to grow domestic activities for space exploration, science, and defense. European nations are demonstrating a commitment to growing spending on defense which increasingly includes space-based national security capabilities. The policy of growing defense spending seems to be at odds with proposed legislation that will ultimately limit competition and significantly increase the cost of space services. CSF urges EU institutions to consider significant changes to the proposed legislation as the current form of the Act presents serious barriers to commercial space companies seeking to provide services to EU citizens and nations. There are several overarching issues detailed below that the EU institutions should consider as revisions and implementing acts are drafted.

Overarching Concerns and Recommendations:

1. Clarify the distinction between "Union space operators" and "third country space operators."

CSF recommends that the EU better defines the term "Union Space Operator", and what is meant by "operating" or "controlling" a space object.

Under the current language (“established in the Union”), it remains unclear whether some companies with varying levels of involvement in the EU are covered by the Act as “Union Space Operators,” rather than “Third country space operators.” The distinction is important, since the obligations on a given operator vary depending on the classification. The definition of “Union operator” should not encompass entities that are headquartered outside the EU and do not launch or operate spacecraft within the Union.

Additionally, the EUSA threatens to disadvantage operators through a differentiated approach for the registration of EU and non-EU operators. EU operators will be able to go through their member state for registration, while non-EU operators are required to go through a more cumbersome process through a “compliance board” within the EU Agency for the Space Program (EUSPA) and with the EU Commission. While the EU authorization through member states has a statutory timeline of up to 12 months, there is no such statutory timeline for the Commission’s decision in the case of the registration of non-EU operators.

2. Establish a true equivalence determination for the United States as soon as possible, and before the obligations proposed in the Act come into effect.

As the EU moves forward with a unified regulatory framework, it is vital that its approach enables “equivalent” acceptance of U.S. standards and policies and avoids barriers that limit the participation of U.S. partners in the EU markets.

CSF appreciates the Commission’s inclusion of an equivalence framework in the EUSA. An EU-U.S. equivalence determination, with certain adjustments to the oversight regime for third country operators, is a necessary step to ensure the EUSA does not significantly disrupt ongoing and future transatlantic space collaborations.

Granting equivalency to the U.S. would allow companies to continue adhering to established and robust U.S. regulations, such as those for launch and space station licensing and the associated substantive obligations, without being required to duplicate efforts under a separate EU registration framework. This would streamline compliance, reduce reporting and hardware redesign costs, and generally prevent the imposition of new barriers for U.S. firms seeking to operate in or contract with European partners.

The peculiarities of the space industry would make it effectively impossible for many U.S. companies to demonstrate compliance with the EUSA. This problem would largely—though not completely—be solved via an equivalence determination as it is currently proposed, but some adjustments must be made. International Traffic in Arms Regulation (ITAR) restrictions, for example, disallow U.S. companies from sharing things like spacecraft “technical details” (Article 25), or “any records, data, procedure, and other material,” (Article 50) with non-U.S. entities. Under the Space Act as drafted, these sharing requirements would be placed on U.S. operators even if an equivalence determination is made.

Many of the proposed requirements and regulations, notably the environmental footprint declaration, are most appropriately considered by a space operator's home licensing jurisdiction. The EU should not impose such requirements on third-country providers of data and services that do not launch or operate spacecraft in the EU.

CSF therefore finds that an adjusted path must be created for third country operators, duly licensed by their home "equivalent" jurisdiction, to provide services in the Union. The oversight bodies, technical file sharing requirements, spacecraft registration, submissions to investigations, etc., proposed for third-country operators are contrary to the spirit of equivalence, and should not apply in the case of a third country "equivalent" operator. The equivalence framework as proposed is perhaps 90% of the way to solving the problem of allowing responsible operators to operate in compliance in both jurisdictions, but the remaining 10% is just as critical.

3. Cost of compliance limits EU access to space capabilities.

CSF recommends the EU significantly pare back and limit the scope of mandatory requirements placed on operators that will drive significant cost increases.

The draft Act proposes new regulations on space safety, environmental footprint reporting, cybersecurity, risk management, and crisis communication planning, among others. These would significantly increase compliance burdens and costs for all operators without corresponding enhancements in space safety, sustainability, or security. The proposed regulations will impose significant costs on space companies including new fees for licensing and registration, internal costs to prepare compliance documentation with new rules, external costs to have the compliance documentation reviewed by outside legal counsel and the designated third party certification entities, costs to prepare environmental footprint information, and costs to redesign spacecraft and operational workflows in order to comply with the Act's new technical requirements. Significant new costs may make it impossible for some companies to offer services to the European market or drive-up costs for European consumers and nations.

Beyond the cost, some of the requirements are simply not feasible. For example, proposed environmental footprint declarations per mission that require life-time analyses (including the supply chain) may be impossible to determine.

Further, these requirements would significantly expand the scope of the EC's regulatory purview to cover non-EU companies' operations in and from foreign soil, in ways that are not proportionate to the treatment of EU-based companies that do business in other jurisdictions. Obligations imposed on American operators should not extend beyond those currently required of EU-based operators in the U.S.

4. Technical Requirements should be performance-based and technology neutral.

CSF recommends that technical requirements and regulations be technology neutral and rooted in science.

Several proposed regulations are overly prescriptive and inappropriately attempt to impose specific means of compliance. This is largely inconsistent with a shift towards performance-based regulations and norms of behavior in the space industry. It is in industry's financial interest to operate safely in space. Overly specific requirements fail to allow for innovative means of compliance. For example:

- Overly prescriptive requirements in Article 73, including rules regarding orbital positioning, congestion, and selection,, distinction between collision risks, and probabilities of successful disposal, currently lack a strong scientific basis.
- The prescriptive requirement in Article 73 mandating propulsion for every spacecraft in a multi-satellite constellation is technology specific and forecloses the use of alternative approaches such as differential drag or solar sails. The EU should focus instead on performance-based maneuverability targets and allow operators to innovate in how they meet such targets.
- The proposed obligation to limit the visual magnitude of spacecraft is currently not technically feasible. Reflectivity requirements should be science-based, non-discriminatory, and technology neutral. The EUSA should not mandate a limit on each satellite or require a spacecraft or constellation to hit a particular threshold at all times, as currently drafted. Instead, the EU should address the real goal of limiting the impact on ground-based astronomy.

5. Provide space operators with more time between entry into force and regulation application to account for redesign needs.

CSF recommends adjusting the implementation timeline to give satellite operators sufficient time to come into compliance, including modifying their systems if necessary. This could be achieved through an extended compliance period, a phased implementation approach, and/or exemptions for satellites that have already been developed (even if intended to be launched after January 1, 2030).

Given the proposed implementation timeline of 2030 (with the possibility of a transition period of two years until 2032), and the expectation that the full legislative package (including Implementing Acts) will not be finalized until 2028/2029, space operators are expected to comply with new rules within just 3-4 years - a relatively short window considering that many operators would have to implement system redesigns to meet EUSA requirements. Additionally, technical requirements are being left to implementing acts, which creates uncertainty and prevents industry from planning effectively for long-term projects. We recommend that satellites that have already concluded the design review phase by the time of adoption of the full legislative package should be exempted from rules in the EUSA and accompanying Implementing Acts.



6.) Eliminate constellation size-based regulatory distinctions for satellite providers.

CSF recommends that the constellation size-based regulatory distinctions for satellite operators be eliminated in order to maintain consistent requirements across all operating companies.

Thank you for the opportunity to submit feedback on the draft Act . Ultimately, major changes are needed to ensure that the regulatory framework supports innovation and allows both the European space industry to thrive and innovate and U.S. companies to continue operating effectively in the European market. CSF looks forward to continuing to work with the Commission and member states to advance partnerships in the global space economy.