



TO:
European Commission
DG-DEFIS
Rue de la Loi 130
1049 Bruxelles
Belgium

Brussels, 16/11/2023

Subject: Mid-term evaluation of the Space Programme

The European Commission (EC) is tasked with the responsibility of assessing the execution of the Programme, as outlined in Article 102 of Regulation (EU) 2021/696. This regulatory framework encompasses a range of critical initiatives, including Galileo and EGNOS, Copernicus, Space Situation Awareness for space surveillance, and GOVSATCLOM for satellite and CASSINI.

The European Association of Remote Sensing Companies (EARSC) and its members acknowledge the EC for its endeavors in promoting the adoption of Copernicus data and services, as well as commercial solutions in Earth Observation (EO). This support is particularly notable on the policy front, exemplified by the regulation addressing deforestation-free products and the introduction of innovative procurement approaches, such as Dynamic Purchasing Systems (DPS).

However, EARSC raises several concerns:

- **Clarity of Program Outcomes:** There is a challenge in understanding the tangible results emerging from the program, especially when considered in conjunction with the budgetary allocations for the European Space Agency (ESA) and Entrusted Entities.
- **Procurement Challenges:** EARSC expresses apprehension about the procurement rules, which have inadvertently led to competition between industry and institutions. Instances of Entrusted Entities bidding to tenders launched by another Entrusted Entity and the involvement of third parties, such as the USA, in these processes.
- **Insufficient Focus on Commercialization and Internationalization:** There is a perceived lack of substantial efforts or actions aimed at providing support for commercialization and fostering

internationalization. These aspects are pivotal components for strengthening the European Space Industry and ensuring its competitiveness on a global scale.

In light of these concerns, EARSC emphasizes the need for a more transparent communication of program outcomes, a reassessment of procurement rules to mitigate competition issues, and a strategic focus on initiatives supporting commercialization and international collaboration. These measures are deemed essential for the continued growth and robustness of the European space sector.

Best regards

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Emmanuel PAJOT

EARSC Secretary General