

4) Towards security and resilience of submarine cable infrastructures

We welcome the EC's Recommendation on the security and resilience of submarine cable infrastructures and the proposed measures to strengthen EU-wide coordination among Member States in the deployment, security, and governance of crucial cable connections.

Diversity in submarine cable systems is crucial for bolstering the resilience of Europe's gateway to the global internet. We strongly advocate for the continued support of the EU's capabilities in submarine cable connectivity from the EU's Connecting Europe Facility (CEF) Digital program, which should be prioritized for refinancing in the next mandate. The goal should be to bolster the competitiveness and relevance of European players in strategic routes and in the components and technological industry compared to non-EU investors. The CEF Digital program could also contribute to reinvesting in critical cables at the end of their lifecycle. Finally, EU funding should address the significant challenge of monitoring the seabed, particularly in areas inaccessible to operators.

Therefore, we support the establishment of a list of Cable Projects of European Interest (CPEIs) that are strategic to Europe's security, resilience, and sovereignty. The deliberations to identify the CPEI list within the newly created Submarine Cable Infrastructure informal Expert Group should involve European cable investors and operators that have first-hand market and technical knowledge. The Expert Group should thus encompass a mechanism to systematically consult industry stakeholders and involve them in decision-making as appropriate.

A joint EU collaboration, particularly concerning permits, would be key to ensuring a coordinated and consistent approach across jurisdictions. Permitting processes for submarine cables currently face significant challenges, characterized by heterogeneity, a lack of a unified information point, and excessive bureaucratic hurdles. The resulting slowness and difficulties in the permitting process not only impact initial installations but also hinder the timely repair of any issues, leading to consequential delays that compromise the security and resilience of submarine cable networks.

We strongly advocate for comprehensive reforms in the permitting procedures. This includes clear identification, simplification, and unification of the process for installation, repair, and decommissioning of submarine cables. These processes should be harmonized throughout Member States as much as possible. The introduction of a one-stop-shop in every country, as indicated by the Commission's recommendation, would be an important first step in this direction.

Finally, while the White Paper rightly suggests that adequate attention should be given to the physical security of undersea cables, we note that no specific scenario or action by the EU institutions is mentioned in this respect. This is regrettable, since the main menace to undersea cables' resilience is not digital but physical.

5) High-level recommendations pillar III

- [Regulatory Framework] Leverage the implementation of the new security framework for products and services to truly harmonize European and national security requirements

across the single market. Close the regulatory gaps where needed, for instance, with respect to cybersecurity ratings.

- [Quantum Technologies] Consider QKD and PQC as complementary and prioritize the development of an EU ecosystem for QKD to assert leadership in the global technological race on quantum technology.
- [Submarine Cable Competitiveness & Innovation] To enhance the competitiveness and autonomy of the EU connectivity market, address the shortage of EU manufacturers of optic fibre cable components and technology. Public support is needed to develop a robust industry and diversify providers of cabling supplies. Additionally, to boost resilience and security, focus on technologies that enable faster repairs of submarine cables and sensing technologies that protect cables from natural and man-made hazards.
- [Submarine Cable Funding] Develop a list of CPEIs together with the EU stakeholders, and support the EU cable industry, particularly by addressing market failures through projects that lay new cable routes and enhance existing infrastructures. Prioritize funding to maintain and enhance the EU manufacturing industry and capable repair fleets. Define strategic projects collaboratively between public and private actors. Increase the budget allocated to the CEF program instead of creating new mechanisms like an equity fund. Stability in funding processes facilitates the submission

of complex submarine cable projects. Additionally, address the shortcomings of the Global Gateway initiative by streamlining grant delivery and ensuring satisfactory returns on investment for projects.

- [Submarine Cable Governance] Establish a pragmatic joint EU governance system for submarine cables together with EU stakeholders that looks into best practices and projects mutualisation, across all cable networks at the EU level. Clarify whether submarine cables are considered publicly available networks and ensure the EU labelling system mentioned by the EC covers cable networks qualified as ECN.
- [Submarine Cable Security] Harmonize security requirements for both the manufacturing and operation of undersea cables with international partners to bolster resilience and security globally. Collaborate with like-minded nations to establish common criteria for a global labelling system of ‘trusted suppliers’ in undersea cable manufacturing and operation. Implementing a standard set of infrastructure protection measures would alleviate regulatory burdens and operating costs for operators, fostering international industry growth. Ensure that national governments assume responsibility for ensuring cable physical integrity and expedite collaboration between administrations and operators to enhance repair capabilities during incidents. Consider the work done in existing international fora like ESCA (European Subsea Cables Association) and ICPC (International

Cable Protection Committee) to facilitate better cooperation.
