



24 February 2021

Dear Commissioner Breton,

In the digital age, space and space-based applications are of central importance for the entire European industry and its global competitiveness. They are key to future technologies such as autonomous driving, Internet of Things (IoT) and big data applications. Space is indispensable for the ability to judge and act in security and defence policies, for climate protection and sustainability and many other policy areas.

To strengthen European New Space industry and to guarantee a sound, innovative and competitive industrial base in Europe as a whole, the European Union needs to consider the whole ecosystem of large system integrators (LSI), small and medium-sized enterprises (SME), suppliers and service providers through all streams and application areas. More attention in this respect is to be paid to the striving start-up sector which is supported by various European initiatives. European start-ups in the New Space environment are developing ground-breaking business models and highly innovative technologies like communication via laser, deorbiting drag sails for a clean space environment, micro-thrusters or even most modern micro satellite busses – all focussed clearly on commercial customer needs.

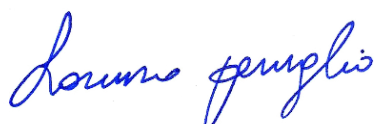
It is essential for the EU to take these young companies much stronger into consideration and to use their innovative potential and market understanding to shape the European space policy and Europe's digital and green future. This future is based upon open competition through awards and the on-following execution phase, making use of e.g. commercial-off-the-shelf (COTS) –

successfully proven in many US programmes. European start-ups, alone or in cooperation, could pose a viable, fast and cost-effective competition to the LSIs, benefiting the competitors themselves by keeping them engaged, but governments, taxpayers and end-users as well. Therefore, we advocate for more openness and a level playing field for start-ups in the implementation of the EU space programme. Start-ups should get fair, equal and direct access to all programmes. While SME and start-ups are well involved in downstream activities surrounding Copernicus and Global Navigation Satellite System (GNSS), their participation in procurements for system deployment, maintenance and operations is hampered by unduly high requirements for financial and technical capacities, by the extremely high administrative burden of procurements under the EU Financial Regulation, and by the need for manpower and pre-investment to participate in larger scale procedures.

Small satellites and constellations offer enormous potential for economy and society. Constellations in Earth Observation and communications carry the potential to substantially complement our observational and bandwidth capacity at fractional costs of traditional systems. In our view, also the start-up-driven and rapidly developing European microlaunchers can excellently complement the existing portfolio of European launch systems with Ariane and Vega in ensuring Europe's independent access to space. They allow a fast and flexible deployment of small satellites and constellations, both for public and commercial customers. The European Payload Policy should take these market developments into account and the European Commission, the European Union Agency for the Space Programme (EUSPA), the European Space Agency (ESA) and member states should carefully consider in addition to the use of new and emerging European launchers also the promising New Space solutions mentioned above, in existing and future programmes, such as the initiative for a European space-based internet constellation.

We would highly appreciate your support in these regards as well as the creation of clear opportunities for New Space companies – both established SME and start-ups.

Yours sincerely,



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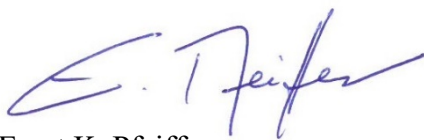
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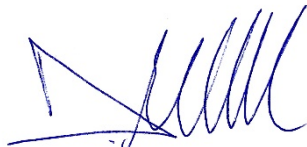
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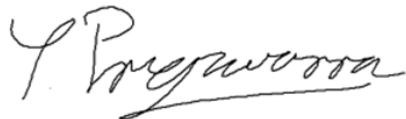
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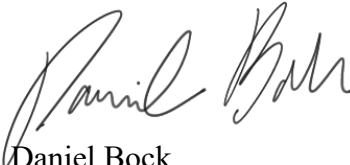
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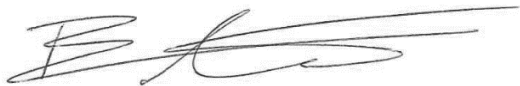
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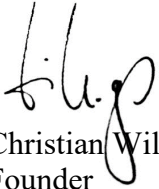
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