

**7 November 2025**

Feedback of

**ACT | The App Association  
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Rue Belliard 40,  
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to the

**European Commission**

regarding the

Consultation on the EU Space Act – new  
rules for safe, resilient and sustainable  
space activities

## I. Introduction

ACT | The App Association (hereafter ‘App Association’) welcomes the opportunity to submit comments to the European Commission’s consultation on the EU Space Act.

The App Association is a policy trade association for the small business technology developer community. Our members are entrepreneurs, innovators, and independent developers within the global app ecosystem that engage with verticals across every industry. We work with and for our members to promote a policy environment that rewards and inspires innovation while providing resources that help them raise capital, create jobs, and continue to build incredible technology. Today, the ecosystem the App Association represents—which we call the app economy—is valued at approximately €95.7 billion and is responsible for more than 1.4 million jobs in the European Union (EU).<sup>1</sup>

## II. General Position on the EU Space Act

The App Association supports the European Commission’s objective to ensure that space activities are safe, secure, and sustainable, and that Europe remains competitive in space innovation and connectivity. Space-based infrastructure and services are increasingly critical to Europe’s digital economy by enabling satellite broadband, navigation, emergency response, climate-neutral activities, and many other applications that directly benefit citizens and businesses alike.

However, as the Commission noted,<sup>2</sup> the space sector is undergoing rapid transformation. The emergence of small and medium-sized enterprises (SMEs), startups, and new entrants, often referred to as the ‘new space companies’,<sup>3</sup> has greatly expanded the range of actors operating in orbit and developing downstream applications. In addition, ensuring the availability of high-speed and reliable Internet access across all regions of the EU, especially in rural areas, is essential for enabling tech companies to operate effectively, reach customers, and collaborate with remote workers.

In this context, the App Association urges the Commission to ensure that the EU Space Act enables this innovation, rather than constraining it through premature or overly prescriptive regulatory requirements.

We believe that the EU Space Act should aim to:

- Promote innovation and competition by ensuring fair and open market access for all operators, regardless of size or location;

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<sup>1</sup> See [https://actonline.org/wp-content/uploads/220912\\_ACT-App-EU-Report.pdf](https://actonline.org/wp-content/uploads/220912_ACT-App-EU-Report.pdf)

<sup>2</sup> European Commission, EU Space Act Call for Evidence (2025)

<sup>3</sup> Private companies, small and medium-sized enterprises and start-ups that develop novel space technologies and applications

- Ensure coherence across Member States by making existing guidelines, national laws, and EU instruments work together effectively, avoiding unnecessary new regulatory fragmentation;
- Allow for industry innovation and cooperation around important issues such as reflectivity without prematurely setting specific requirements to avoid causing a focus on compliance rather than innovation to solve problems that matter to the whole community.
- Encourage international alignment with existing global standards and best practices and best practices (e.g., International Standards Organization standards and guidelines from the Inter-Agency Space Debris Coordination Committee) to ensure interoperability and reduce duplication.

### III. Policy Approach

The App Association supports the EU's policy objectives for safe, secure, and sustainable space activities. However, new binding rules should only be considered once existing measures have been fully implemented and their effectiveness assessed. The EU is currently undergoing a simplification phase, and many relevant frameworks (e.g., non-binding guidelines on space safety and sustainability, national space laws, NIS2 Directive, Critical Entities Resilience Directive, and Cyber Resilience Act) have only recently come into force. Introducing new rules prematurely risks unnecessary complexity, duplication, and barriers for SMEs and startups.

- **Safety and traffic management:**

Space congestion and debris pose real challenges, but safety measures must remain proportionate and technology-neutral. Rigid operational rules or licensing frameworks could restrict innovative solutions. The EU Space Act should set clear safety objectives while allowing operators flexibility in achieving compliance. Rather than introducing new rules, the focus should be on ensuring current guidelines and national measures operate effectively and coherently.

- **Security and resilience:**

Europe's space infrastructure is critical to economic and security interests. Yet overlapping obligations under instruments such as NIS2, the Cyber Resilience Act, and the Critical Entities Resilience Directive risk creating administrative burdens. The Space Act should provide a coherent baseline framework that complements existing legislation and avoids duplication. In this scenario, any consideration of new rules should wait until it is clear that existing frameworks function together efficiently.

- **Sustainability and environmental protection:**

The App Association supports environmentally responsible space operations. It is important that the methods to assess environmental impact are effective, and much of the research in this area is still evolving. A flexible, science-based approach will allow regulators and industry to co-develop robust assessment methodologies. Binding

sustainability requirements should only be considered after ensuring that current guidelines and regulations are working together effectively.

For these reasons, the EU should adopt a baseline, implementation-first approach. Existing non-binding guidelines and EU cybersecurity rules should be allowed time to demonstrate effectiveness. Impacts should be thoroughly assessed and regulatory coherence ensured before introducing new obligations. This approach protects innovation, supports SMEs and startups, avoids creating barriers to innovation, and ensures that additional regulations are necessary, proportionate, and effective.

The EU Space Act should also support Europe's 'new space companies', largely composed of small businesses and startups driving innovation in satellite technology and connectivity applications. To foster growth, the Act should maintain a technology-neutral approach that incentivizes the deployment of broadband solutions leveraging spectrum assets efficiently, and encourages cross-sector collaboration between space, telecommunications, and digital industries.

Finally, international cooperation will be key. The EU should align its framework with global standards and engage with international partners on consistent regulatory approaches. Such coordination will promote interoperability, legal certainty, and shared progress.

Among the different policy options proposed by the Commission, this position reflects a baseline policy approach: relying on existing non-binding guidelines, national space laws, and EU cybersecurity rules, while only considering new binding requirements after observing their implementation and assessing their impact.

#### IV. Conclusion

The App Association welcomes the European Commission's commitment to ensuring the safe, secure, and sustainable use of space. At the same time, the forthcoming EU Space Act must strike the right balance between safeguarding public interests and enabling innovation.

A well-calibrated framework should align with international standards and best practices, avoid creating unnecessary barriers to entry or innovation, promote technology-neutral and proportionate rules, and ensure coherence across EU regulatory instruments affecting space operations and cybersecurity.

By adopting a proportionate, innovation-friendly approach, the EU can foster a thriving and competitive space economy that empowers SMEs and startups, expands connectivity, and strengthens Europe's innovation and growth.

Sincerely,



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