

Proposal for the Regulation of the European Parliament and of the Council on the European Earth observation programme (GMES) and its initial operations (2011 – 2013)

COMMENTS FROM INDUSTRY

The Proposal for the Regulation on GMES and its initial operations aims at establishing an Earth observation programme led by the EU, in order to reflect its ambition to better manage the environment and to enhance the security of citizens, in Europe and abroad. In addition, while establishing the legal basis for this programme, the Proposal also set up the mechanisms necessary to ensure its initial operations before the next Financial Perspectives of the EU, where a budget will be necessary for the fully operational programme.

Industry supports the general principles of this European Earth Observation programme and its general architecture comprising three main components¹ and believes that the European Commission has taken a crucial and sound step forward.

However, the challenge is still ahead. A set of mandatory conditions needs to be fulfilled in order to obtain a successful implementation of the Initial Operations: efficient management structures, buy-in by the end-users and the member states, sustainable services performing according to needs (despite a limited budget for this bridging period).

As the European Parliament and the Council are currently in the process of examining this proposal, Industry would like to make the following comments.

Ownership

Space industry recommends that the issue of ownership of the infrastructure linked with the space component is dealt with as soon as possible, as it will also provide a much needed clarification about the scope of the role of the operators of the space infrastructure.

Operations

The architecture of the GMES service operators is open for the time being. This is appreciated and private service operators hope to discuss with the European Commission ways to implement the most efficient operational scheme.

Regarding the budget proposed for GMES operations – 40M€ under the line "Support to space infrastructure operations" – as far as Industry knows about the costs of operations of Sentinel 1A, 2A and 3A, this figure seems insufficient and it must be checked with Eumetsat and ESA (ESA will operate the Sentinels *ad interim*) as to what will be a sufficient envelope to ensure proper GMES operations (also taking into account that these funds cannot come from ESA budget).

In addition, the major interest of the GMES programme lies on the continuity of information it will deliver; therefore, it is worth noting that the launches of the "B" units of the Sentinels, whose development is currently co-financed by the EU, are not yet budgeted for. The cost of these launches, estimated to be around 165M€, will have to be covered by the EU operational programme but it is necessary that a commitment to support these costs is made at least two years before the launch date, so before the start of the next EU Financial Perspectives.

¹ The service component is ensuring access to information covering these thematic areas: land monitoring; emergency management; security; monitoring of the marine environment; atmosphere monitoring; climate change adaptation and mitigation.

The space component ensuring sustainable spaceborne observations for the thematic areas referred above.

The in situ component ensuring observations through airborne, seaborne and ground-based installations for the thematic areas referred above.

Also, it would seem wise that the EC provides a contingency plan showing how to re-allocate the budget for operations to data procurement and services in case of delays in the launch of the Sentinels.

Data access and data policy

GMES Information and communication infrastructures shall be based on well-defined operational, functional and technical system architectures and clear Data & Information Security solutions.

GMES will have to rely on system architectures which should take into account resilience and accessibility requirements and information security aspects to ensure the confidentiality, integrity and authentication of information exchanged between data/service providers and end-users.

Regarding data policy, Art .8 states that the data and information policy for actions financed under the GMES programme shall aim at full and open access to [...] data collected through GMES infrastructure (subject to relevant security restrictions).

Such a decision will shape for a long time the future of Earth Observation Services in Europe and thus this decision should only be taken after assessing very carefully how it will influence the competitiveness of European data and services providers, as well as the perspectives for the European space industry to invest in new Earth Observation missions.

In particular, Industry recommends that “data collected through GMES infrastructure” be clarified: does it concern only the Sentinel satellites or also the contributing missions? Does this “full and open access” apply worldwide?...

Atmospheric and oceanography services

The continuity of access to critical data for the Marine and Atmosphere services should be secured in the GIO timeframe, particularly considering their key contribution to the detection of global climate changes (i.e. detection of global sea level rise). Industry would recommend consulting with the meteorological community and atmosphere and oceanography service providers to make absolutely sure the EC proposal does not impair significantly the continuity of existing services, in particular for the few industries and SMEs involved, where the problem of continuity of funding is crucial.

Emergency Response service

Industry points out that the budget proposed for Emergency Response core service (ECRS) is limited in comparison with the current 2009-2011 ERCS budget implemented through SAFER (via FP7 funds) and would only allow for about half the yearly activations of SAFER. Industry recommends that users of these services are consulted to make sure this scaling down does not represent a threat to the security of citizens.

Security related services

Provision of the GMES infrastructure component addressing Security missions is of utmost importance for sustainability of European operational centres in charge of Security missions. Developments have been made in the frame of FP7 (LIMES and G Mosaic and, soon, in Maritime surveillance) and future activities have to be guaranteed by securing a part of the GMES FP7 budget.

FP7 funding within the GIO budget

There is no clear indication on how the 43 M€ earmarked as FP7 within the 150 M€ for GIO will be used. The EC should provide clear priorities for the use of this budget especially as FP7 rules imply that projects funded with this budget line will have to be co-financed by industry.

x
x x