PSC Europe

PSC-Europe/002-2025

Open Consultation
EUCCS Call for Evidence

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OPERATION	NAME	ORGANISATION	DATE
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PURPOSE	
Consultation	X
Reply requested	

PSC-Europe's response to the Commission's Call for Evidence - Impact Assessment on European Critical Communication System

Submitted on: 23 May 2025

"PSCE fully supports the establishment of EUCCS. European responders are today using 20–25-year-old technology which can only be used within member states in most cases. This limits civil protection and police cooperation across Europe and only allows for voice and short text communication. It is now time to upgrade to leverage the commercial scale of mobile technology, across Europe, allowing for rich media exchange, providing enhanced shared situational awareness, this facilitates more efficient response of all responder disciplines in the face of disaster, and the fight against crime and terrorism. EUCCS must build a secure and resilient mobile capability across Europe to realise Operational Mobility - the ability for responders to carry out their operations with mobile communication, wherever they are, whenever they need to communicate, and with whoever they are tasked to collaborate with across Europe. PSCE have coordinated projects BroadMap, BroadWay and currently EUCCS Preparation, which provides the technical and operation experience foundation. Many of our member state & practitioner partners and members are involved involved in these originating projects. Policy Option 2 is our suggested option. Furthermore, our younger community of users will adopt a more familiar way to communicate, having grown up with mobile technology."

PSC-Europe

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14532-European-Critical-Communication-System_en

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14532-European-Critical-Communication-System/F3555081_en

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European Commission

CALL FOR EVIDENCE
FOR AN IMPACT ASSESSMENT

This document aims to inform the public and stakeholders on the Commission's future legislative work so they can provide feedback on the Commission's understanding of the problem and possible solutions and give us any relevant information that they may have, including on possible impacts of the different options.

TITLE OF THE INITIATIVE	European Critical Communication System
LEAD DG (RESPONSIBLE UNIT)	DG HOME, D2
LIKELY TYPE OF INITIATIVE	To be determined
INDICATIVE TIMETABLE	Q2 2026
ADDITIONAL INFORMATION	https://home-affairs.ec.europa.eu/policies/law-enforcement-cooperation/operational-cooperation_en#towards-an-eu-critical-communication-system

This document is for information purposes only. It does not prejudge the final decision of the Commission on whether this initiative will be pursued or on its final content. All elements of the initiative described, including its timing, are subject to change.

A. Political context, problem definition and subsidiarity check

Political context

Every day, people in Europe in emergency situations, from traffic accidents to extreme weather events and ultimately to terrorist attacks, trust on the fast efficient and professional response of public authorities in charge of security and safety[1]. To ensure that, police forces, fire brigades, rescue and civil protection services, among others, need to communicate with each other whenever and wherever they are, exchange information in real time in a secure manner and cooperate with whomever they are tasked to. However, today a European secure and resilient communication system that allows for real-time, cross-border and cross-agencies communication does not exist. On top of that, many Member States still use outdated communication technologies that only permits for voice communication, not meeting the needs of public authorities that often require to exchange videos and sensitive data. This means that when crossing a Member State border, public authorities in charge of security and safety need to find ad hoc solutions to communicate and cooperate, which are suboptimal, as not time-efficient and not secure. The establishment of the European Critical Communication System (EUCCS) aims to concretely answer to this challenge, enhancing Europe's capacity to react collectively in times of crises. This means that public authorities in charge of security and safety will be able to carry out their operations wherever they are, whenever they need to, and in cooperation with whomever they are tasked to, without the need to adapt their devices and systems when crossing a European border.

The Commission is working with the EU Member States and Schengen Associated countries to establish the technical[2] and legal base[3][4] of such System. The clear political mandate of President von der Leyen[5][6] reinforce the cruciality of the EUCCS to react to current security challenges, ensuring a safer Union. The system is to be

[1] Law enforcement agencies, police, fire brigades, emergency medical services, coastguards, search and rescue, mountain rescue, prison officers, customs and border authorities, prosecution and judicial authorities

[2] See https://cordis.europa.eu/project/id/786912 ; https://euccs.eu/

[3] See Council Conclusions 9545/21 on the Protection of Public Spaces (2021); Council Recommendation (EU) 2022/915 on operational law enforcement cooperation (2022); Decision (EU) 2022/2481 of the European Parliament and of the Council establishing the Digital Decade Policy Programme 2030; JOIN(2023) "EU Space Strategy for Security and Defence"; COM(2024) 81 final "White Paper on mastering Europe's digital infrastructure needs".

[4] Niinistö, S. (2024). Safer Together – Strengthening Europe's Civilian and Military Preparedness and Readiness, p. 59 and 69

[5] Von der Leyen, U. (2024). Europe's choice - Political Guidelines for the Next European Commission 2024−2029, p. 15

[6] Von der Leyen, U. (2024). Mission Letter – Magnus Brunner, p.6

established by 2030.

Problem the initiative aims to tackle

- Lack of secure communication across borders and agencies:

The main problem is that currently most the EU Member States' critical communication systems are operated in isolation from one another, meaning that communication equipment cannot be used in the territory of other Member States or shared by different authorities of the same Member State. Instead, public authorities in charge of security and safety often rely on unsatisfactory ad-hoc arrangements to ensure their communication (e.g. authority A giving one of its communication devices to authority B), greatly diminishing their effectiveness in times of crisis or when securing major events (e.g. sporting event). Many Member States still use outdated communication technologies[7], that only permits for voice communication, not meeting the operational needs of public authorities that often require to exchange videos and sensitive data. These operational needs can range from the hot pursuit of criminals or the controlled delivery of drugs by law enforcement across the Schengen internal borders to disaster response following floodings and forest fires.

- Threats to communication infrastructure

Communication infrastructures used by public authorities in charge of security and safety represent a target for malign actors, via cyber-threats, signal jamming or sabotage of physical infrastructure. Their functionality can also be severely interrupted or damaged due to natural or man-made disasters. These communication systems have particularly high requirements for reliability and resilience, given their critical function. However, the standards applied to many of these critical communication systems date back decades, not meeting the necessary requirements for resilience and robustness. Several Member State are therefore modernising their national critical communication systems, transitioning to a broadband[8] based system. Other Member States continue using their older TETRA systems, as moving to broadband is costly. These diverging approaches of Member States risk making the communication and cooperation across borders and agencies less secure and less resilient.

- Dependence on suppliers outside of Europe

Critical communication depends on supply chains for network infrastructure, devices and software. Today, there is global competition for strategic positioning in the communication sector and the setting of standards. Critical communication systems are a small segment of the overall communication market and are not driven by normal market drivers; however, they represent a particularly sensitive component for governments, directly relevant for ensuring public security. Technological sovereignty without undue reliance on suppliers outside of Europe is thus crucial for EU internal security.

Basis for EU action (legal basis and subsidiarity check)

Legal basis

The legal basis is to be decided, and it will depend on the result of the impact assessment.

Practical need for EU action

The establishment of a European critical communication system is a competence that the EU shares with the Member States. In 2023, the DG HOME established the Mission Critical Communication Group (MCCG), an expert group comprised of national experts in the field of secure communications and from public authorities in charge of security and safety. In their discussions, the members of this expert group clearly identified the practical need to establish an EU-wide system to ensure secure communication among public authorities in charge of security and safety across borders and agencies. The expert group started to explore the possible technical, governance and legislative structure of the EUCCS.

B. Objectives and policy options

The general objective of this proposal is to establish a European critical communication system that will connect communication networks of public authorities in charge of security and safety in Europe, allowing for seamless critical communication and operational mobility across the Schengen area. By doing so, EUCCS will enhance the resilience of public communication infrastructure and ensure Europe's capacity to react in times of crises. Another key objective is to ensure the continuous evolution of critical communication systems by fostering targeted and dynamic innovation. That will allow EUCCS to remain future-proof and avoid very long and static lifecycles of

[7] Usually TETRA system. TETRA (Terrestrial Trunked Radio) is a system widely used in mission critical operations. TETRA is a standard set by the European Telecommunication Standard Institute (ETSI) in 1995 for a trunked radio system.

[8] In telecommunications, broadband or high speed is the wide-bandwidth data transmission that exploits signals at a wide spread of frequencies or several different simultaneous frequencies, and is used in fast Internet access.

critical communication systems.

Baseline scenario
If no EU action is taken, there will be further fragmentation between Member States' critical communication systems. Some will continue operating systems on the current TETRA, TETRAPOL and DMR standards well beyond 2030. Others will already shift to broadband based systems, creating even higher obstacles for integration between older and new systems.

Option 1: non-legislative measures.
Non-legislative measures in the form of a Commission Communication that pursue technical connectivity on a voluntary basis. This option allows for quick implementation and voluntary participation from Member States. It can facilitate cooperation between countries in a less complex manner, as participation is not mandatory. Non-binding regional operating procedures for cross-border and interagency communication and cooperation could be developed between different groups of Member States, as it is already the case between the Nordic countries.

Option 2: legislative proposal
Legislative proposal establishing a System of Systems. This option offers a harmonized solution while still respecting Member States' sovereignty. It allows for the possibility of leveraging financial and operational support at the EU-level, potentially resulting in a more efficient and effective system. The legislative proposal would define the overall objective, geographical scope, participating authorities, EU and Member States' level components (e.g. competencies and responsibilities of the EU and Member States' competent authorities; minimum technical requirements for national systems), standard operating procedures as well as common applications, tools and services. It would allow for a gradual establishment, allowing Member States to 'phase-in' broadband and 'phase-out' narrowband over a longer time.

Option 3: establishment of a centralised system at EU-level
The creation of a centralised system offers a "one-size-fits-all" solution, providing clear decision-making capabilities. This option can streamline processes and ensure consistent implementation across all Member States. It would entail the elements mentioned in Option 2, but giving Member States much less flexibility how and when to join the European system and a much more centralized management.

C. Likely impacts

The establishment of the EU Critical Communication System (EUCCS) necessitates a strategic investment at the European level to ensure robust and reliable communication infrastructure across all member states. This initiative will not only enhance our collective communication capabilities but will also yield significant economic benefits, stimulating investments, creating business opportunities, and fostering both competitiveness and strategic autonomy within the European Union. Implementing the EUCCS at the EU level is anticipated to involve costs significantly lower than those incurred through individual efforts by Member States. It is recognized that Member States are independently progressing towards updating their communication systems. However, a harmonized approach under the EUCCS framework offers a more efficient and unified solution, thereby maximizing the value derived from the expenditure and efforts involved. Currently, it is premature to provide precise financial estimates. However, the new French Critical Communication System "Reseau Radio du Futur"[9] required an investment of approximately EUR 900 million. This example serves to illustrate the potential scale of investment needed. It is critical to emphasize that the resources allocated towards the EUCCS will extend beyond just the enhancement of our communication systems; they will unlock substantial economic opportunities, driving investment, and fostering the creation of competitive digital solutions within the European market.

D. Better regulation instruments

Impact assessment

An impact assessment will be conducted to support the preparation of this initiative and to inform the Commission's proposal. The European Commission is planning to launch a supporting study to provide evidence and explore the feasibility of the options referenced above. It will assess impact of the options on Member States, as well as Mobile Network Operators and any other potentially affected stakeholders. The Commission will aim to complete the impact assessment in the Q1 2026.

Consultation strategy

The Commission will consult as widely as possible to gather evidence, key information on the establishment of European critical communication system. Apart from this call for evidence, a public consultation is planned for this initiative. It will be made available during 12 weeks in all 24 EU official languages in the Have your say website.

[9] ACMOSS - Le Réseau Radio du Futur au service des acteurs de la sécurité et du secours

Moreover, evidence will be also gathered from the Mission Critical Communication Group. The Commission plans to organise regular sessions of Mission Critical Communication Group. Additionally, the Commission plans to organise workshops under the CERIS (Community of European Research and Innovation for Security) banner involving other relevant stakeholders, such as representatives of economical operators, international organisations and mobile network operators.

A factual summary report of the contributions to the public consultation will be published on the consultation page 8 weeks after the public consultation closes. A synopsis report, summarising all consultation activities, will be made available as an annex to the impact assessment.

Why we are consulting?

The consultation aims to i) gather views on problem definition; ii) gather views on the scope of public authorities in charge of security and safety (police forces, rescue services, fire brigades etc.) to be covered; and iii) familiarise and involve the relevant stakeholders.

Target audience

The main stakeholders identified are: i) Member States (Ministries of the Interior, infrastructures, and telecommunication, national regulatory authorities); ii) public authorities in charge of security and safety (such as: law enforcement authorities, civil protection, fire brigades, rescue services) ; iii) other expert groups; iv) mobile network operators (including trade association); v) other industry (manufacturers, app developers, etc.); vi) international organisation in the field of critical communications; vii) satellite operators, manufacturers, trade association and satellite-based public initiatives (e.g. IRIS2[10]), viii) standardisation bodies (3GPP[11] and ETSI[12]) and ix) citizens

[10] Infrastructure for Resilience, Interconnectivity and Security by Satellite (IRIS2) will be the new European multi-orbital constellation

[11] 3rd Generation Partnership Project (3GPP) is a global initiative of standard organisation which develops protocols for mobile telecommunications

[12] European Telecommunication Standard Institute