



November 6, 2025

**Aerospace Industries Association Submission
on the Proposed European Union Space Act**

The Aerospace Industries Association (AIA), representing the nation's leading aerospace and defense companies, appreciates the European Commission's efforts to advance the European Union Space Act (EUSA) and its commitment to promoting space safety, sustainability, and regulatory coherence. **We strongly support the development of robust, transparent, and harmonized global space regulations that benefit not only European and American companies, but also the broader international space community.** A well-aligned regulatory framework can foster innovation, reduce operational uncertainty, and strengthen transatlantic collaboration in space.

We recognize the ambition and intent behind the EUSA to drive safety and sustainability and **believe there are opportunities to refine the current draft to ensure it supports fair access, encourages interoperability, and avoids unintended consequences for both European and U.S. stakeholders.** We look forward to engaging constructively with our U.S. and EU counterparts on behalf of U.S. industry, to help shape a framework that advances shared values and mutual success in the space domain.

The EUSA offers an opportunity to **champion international best practices**, particularly in areas such as debris mitigation and the protection of Dark and Quiet Skies. These practices reflect the thoughtful contributions of the global space community and should inform the development of a comprehensive regulatory framework. At the same time, it's important to recognize that best practices, while foundational, should not limit the potential for broader policy action where more ambitious or tailored approaches are needed.

Another critical opportunity within the proposed EUSA is to **recognize and build upon well-established regulatory frameworks, particularly those of the United States.** This is a moment to build a globally harmonized approach to space governance, one that benefits American, European, and international companies.

The EUSA's intent to ensure responsible management of large satellite systems is commendable, as are the Commission's efforts to address aggregate risks. That said, the EUSA should remain focused on the risks that may be generated by large constellations as opposed to constellation size in and of itself. The Commission should also **consider how the definitions and thresholds for large constellations could have unintended consequences on the ability of certain operators to operate and compete.**

The EUSA includes provisions that could allow the EU to assert jurisdiction over third-country data providers, even when data is not downlinked or exchanged within the EU or



using EU infrastructure. This approach diverges from long-standing U.S. regulatory norms and risks setting a precedent for extraterritorial overreach. Of particular concern are the proposed powers for the EU to inspect facilities located outside its borders. The EUSA should **consider how inspections could compromise business confidentiality, conflict with U.S. export control regulations (including International Traffic in Arms Regulations (ITAR) and Export Administration Regulations (EAR)) and infringe on national sovereignty.**

The framework should use clear, affirmative language to ensure emerging capabilities and missions remain authorized and are not subject to disproportionate or technology-specific constraints. The EUSA should **accommodate emerging capabilities such as satellite life-extension and on-orbit refueling.** Narrow or technology-specific definitions of “space activities” could inadvertently exclude these services, which are increasingly critical to sustainable space operations.

AIA appreciates the European Commission’s commitment to deepening transatlantic cooperation and demonstrating shared leadership in responsible space governance through the EUSA. We look forward to working alongside European policymakers and industry partners to help shape a framework that enhances safety, promotes sustainability, and strengthens international collaboration, while enabling continued commercial innovation and competitiveness.