

Airbus is a space business world leader, the only company with activities on the whole value chain, from access to space (through its participation in Ariane Group) to added value services, including the design and manufacturing of satellite systems and their operation in orbit.

Airbus promotes a safe and sustainable use of space, because it is a *sine qua non* condition of the sustainable development of space activities.

Airbus abides by space laws, standards and industry best practices i.e. safety, safe removal of satellite and vehicles at the end of their operational life, but is also pushing with the international community to go farther. For instance Airbus is actively supporting the development of the Space Sustainability Rating, and eco-label for space missions under the World Economic Forum aegis.

This commitment goes beyond Airbus' interest as a commercial organization generating revenues from the space domain, and it is in the interest of all to protect this natural resource, since space is vital to the daily life on Earth and the running of our societies – from weather forecasting to global connectivity, climate change monitoring and navigation, positioning and timing.

In a competitive global environment, Airbus urgently calls for a level playing field where the highest standards of sustainability are applicable to all, for the benefit of all.

Space traffic is fast increasing (the number of operational satellites has more than doubled over the past years because of the launch of large satellite constellations) and certain orbits bringing operational advantages have become concentrated areas of space traffic. The increased use of space by all States and non-governmental entities will only increase further the traffic. This triggers a potential for collision and debris generation with a domino effect that in the long term could jeopardize future use of key orbits.

The sustainability of Space is thus key to global development and while in the short term measures on debris mitigation are already in implementation, a set of new STM solutions are needed.

First of all it is mandatory to have access to an accurate and objective knowledge of the trajectory of all space objects that could have a significant effect in case of impact. No State (not even the US) has the capability to monitor current space traffic to this required extent.

Europe needs instantly to develop a vision, on top of policy considerations and geopolitical concerns. Airbus calls on the Commission and the Member States to move to the next level as indicated in the Action Plan on synergies between civil, defence and space industries.

The EU Strategy for STM (a flagship project) has to go much further than the initial SST capability steps that have been pursued at ESA and EU level. The SST

capability should be way further developed, and many other issues have to be addressed such as launch notifications and traceability, cooperation with satellite operators, backtracking of historical launch remains, enforced safety measures against in-orbit fragmentation, deorbiting insurance and safety measures, as well as many other topics.

Industry should be admitted into upcoming discussions on which architecture is needed for a global STM system and how the funding available for the SSA program under the European Space Program could be most efficiently used.

Clear programmatic and technical goals (e.g. quantification of an object catalogue suitable to reduce collision risk to an acceptable level) for STM need to be defined as prerequisite to develop a useful and competitive European system architecture in an incremental approach. While the federation of national sensors is a reasonable first step, such a bottom-up approach will not achieve the required performance. Necessary developments therefore need to be coordinated between the participating countries.

A network of data-gathering sensors on ground and in space is needed. This would sit the Union strategic sovereignty and look after the Union strategic space assets such as the Galileo and the future security of space-based constellations. Several issues also require research and technology developments.

While STM has been recognized in the US also as driver for a possible new economy around it – examples being commercial SSA data provision and on-orbit services – Europe needs to catch-up on this and encourage such commercial opportunities.

ESA can contribute on the technology development front capitalizing on their experience from the ESA SSA and S2P program and operating a fleet of scientific missions. Last but not least, believe that in the future the discussion started at intergovernmental level at the UN COPUOS will lead to a systemic evolution and we support the adoption of a STM regime “*ICAO like*” with a permanent international legal framework, provisions for space traffic and technical standards regularly revised and an organizational frame. New entrants could perceive these measures as barriers raised by established players. A possible way forward could be to propose an incremental set of rules with increasing demanding measures as new players reach some milestones so that they can gradually implement state of the art clean space use.