


EARSC

European Association
of Remote Sensing
Companies

Mr Philippe Brunet,
Director of Aerospace, Maritime, Security and Defence Industries,
EC DG-Enterprise,
200, Rue de la Loi,
Brussels
Belgium

6th October 2014.

Dear Mr Brunet,

I am writing concerning the EC proposal for a Directive on the Dissemination of Earth Observation satellite data for Commercial purposes.

EARSC represents EO service companies engaged in the full range of activities from satellite operator and data (re)seller, through to value adding companies and those selling geospatial information. As such the major views of the industry potentially affected by the proposed legislation are represented by the Association.

During the consultation last year, we reported that no European EO company had been expressing any concerns over their ability to distribute or receive satellite data which is still the case today. In consequence, we maintain the view that such legislation will not have a positive impact on the market. We cannot support the claims made in the justification that this measure will increase data revenues and jobs.

In general we believe that appropriate legislation is required to do business. Whilst we recognise that some controls are required for licensing of satellite operators, our view is that these should be kept to a minimum. A light approach seeking simply to establish common criteria in all Member States could be an example of appropriate legislation but recognising that any approach needs to be adopted globally to avoid disadvantaging European companies.

In this respect we note the recent changes in the US which has granted DigitalGlobe, a major competitor to European businesses, the right to sell data down to 25cm resolution. This gives them a significant advantage in the market and we should greatly appreciate efforts from the European Commission to enable improved conditions for European companies.

We also note the US Commercial Remote Sensing Policy adopted in 2003. This defines conditions whereby commercial companies can do business and favours the purchase of



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data. It encourages companies to develop and launch high-performance systems with the intent to place US industry at the leading edge of the market. It represents a partnership between US policy makers and US industry to develop commercial services to a maximum.

Hence we would encourage the EC to work with industry with a view to developing new policies and actions which can help the European EO services sector to develop. Some specific proposals are:

- Conditions which will help innovative companies in Europe bring new ideas to market with minimal legislative restrictions and strong support from EU policy makers.
- A policy regarding the public procurement of satellite data which can help European companies mitigate risk and develop new commercial supply sources.
- Policies to enable European companies to develop their business in export markets
- An approach to the procurement of Copernicus Services which will help EU companies maximise their participation and help them exploit these capacities in new markets in Europe and beyond. In this respect, see the recent EARSC position paper on “Procurement of the Copernicus Services”.

EARSC is ready to discuss what could be done to help this to happen. We shall contact your office in the next few days to seek a meeting and discuss some of these ideas.

Yours sincerely,



Han Wensink

EARSC Chairman.