

## Enhancing the Security and Resilience of Subsea Power Cables in European Seas

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Europacable, the voice of Europe's leading cable system manufacturers, recommends for the following aspects to be considered to further enhance the Security and Resilience of Europe's subsea power cable assets:

- ***Mandatory security screening of non-trusted third country cable suppliers***
- ***European Preference for infrastructure equipment in EU Public Procurement***
- ***Operators to make full use of available technologies & market solutions***
- ***“Security by Design” approach mandating Smart Cable deployment and unified data governance***
- ***Retrofitting older power cables***
- ***“Cable Security Toolbox” for power cables***
- ***Fast repairs through mandatory repair service agreements***
- ***Strategic stockpiling of grid essentials***
- ***Repair Vessels to be made available through service level agreements***

**Based on the technical and operational experience of our European member companies, we urge for these to be accounted for when implementing the EU Action Plan on Cable Security as published by the European Commission in February.**

Underground and subsea power cables are strategic and critical net-zero technology empowering Europe's decarbonisation. Recent incidents have shown the urgent need for Europe to enhance its prevention, detection as well as response and recovery capacities against intentional damages. Both, short and mid- to long-term solutions are needed. Technical as well as market solutions are readily available to be deployed by operators. The supply industry is fully committed to actively enhancing the resilience of Europe's critical subsea cable assets.

**Europacable recommends the following:**

### **1) Enhancing the Security of critical subsea power cable infrastructure**

#### **a) Mandatory security screening of non-trusted third country cable suppliers**

Subsea power cables like inter-array cables deployed within wind parks, export cables connecting wind parks to shore and notably energy interconnectors cables between two countries are critical assets carrying sensitive information. Europe is home to the world's leading cable system manufacturers and should leverage on this to ensure that Europe's networks are built with cables made in Europe for Europe. Mandatory security screening of non-trusted third country cable suppliers should be consistently applied to control and limit access of non-trusted third country suppliers across all legislation, regulation, public procurement, private tenders and to projects receiving EU funds, including EU grants and EIB loans and/or credits.

- ***Europacable recommends the introduction of mandatory security screening of non-trusted third country cable suppliers both in public procurement, private tenders as well as in EU funded projects.***

#### **b) European Preference for infrastructure equipment in EU Public Procurement**

Public Procurement is a strategic tool to support important sectors and reinforce the EU's key competitiveness priorities and decarbonisation ambitions in leading net-zero technologies, such as grid equipment manufacturing. The development of a dedicated “European

Preference Principle” would ensure European competitiveness in supplying sustainable cable systems and promote the strategic autonomy of European manufacturing of this critical technology. To do that, public procurement should apply a minimum of 30% evaluation for the European Preference Principle in public tenders. This preference principle should consist of mandatory requirements for security, resilience, and ESG to promote European technologies, security and values.

- ***Europacable recommends the introduction of a “European Preference Principle” in the EU Public Procurement Directive for particularly critical electricity infrastructure equipment with a minimal of 30% evaluation in public tenders***

#### **c) Operators to make full use of available technologies & market solutions**

The European cable industry has a variety of technologies and market solutions readily available to minimise possible cable threats, detect incidents as well as respond to them and rapidly repair damaged cable infrastructure. Europacable urges the EU and member states to empower asset owners to make full use of available technical and market solutions that encompass monitoring, preventive and corrective maintenance technologies and services.

***Europacable recommends that:***

- ***Operators should define the specific security needs and associated level of performance they consider relevant for their specific assets. The European industry will then meet these requests by proposing technologies and market solutions;***
- ***Where possible, regional harmonisation of performance needs on top of existing performance service level agreements should be considered; and***
- ***OPEX compensation and/or incentive schemes at national level via national regulators should be foreseen to compensate operator’s expenditures supported by EU level where possible to enhance the level of performance available on the market.***

#### **d) “Security by Design” approach mandating Smart Cable deployment and unified data governance**

Subsea power cables should be designed and deployed as “Smart Cables” by equipping them with state-of-the-art monitoring technologies. Early warning, intelligence and detection of subsea power cable damages can be enhanced through cable design, installation and burial techniques, as well as sensing and monitoring systems. Cable monitoring can also help military/intelligence services.

Furthermore, to support early identification and preparedness, Europacable recommends including a call for more unified data governance at EU level. This would enable secure sharing and processing of monitoring data between operators, industry and authorities. Clear rules and operating procedures would improve interoperability, increase resilience, and help turn monitoring data into actionable insights for prevention and rapid response.

- ***Europacable recommends a “Security by Design Approach” mandating deployment of Smart Cables via EU legislation and making it applicable for public and private tendering in coordination with unified EU-wide data governance.***
- ***Europacable recommends that to empower Europe’s leading cable manufacturers to continuously drive innovation of “Smart Cables” further, the European Union and Member States should consider allocating financial support to continued R&D initiatives driven by industry, e.g. under the new EU Defence Fund which should foster innovation in “smart cables”.***

#### **e) Retrofitting older power cables**

Subsea power cables are designed to operate in the harsh offshore aquatic environment for at least 40 years. And they do. Accordingly, many already installed cables will still be in operation for a substantial time moving into the future. Sensing and monitoring technologies

are available that can be retrofitted on existing assets, thereby making them “smarter” as per the above recommendation.

- ***Europacable recommends retrofitting of existing subsea power cables with sensing and monitoring technologies to enable a coherent protection of all existing and future assets in European waters.***

#### **f) “Cable Security Toolbox” for power cables**

The EU Cable Security Action Plan calls for a “Cable Security Toolbox” to be modelled on or included in the existing 5G toolbox, which includes measures like restrictions for suppliers considered as high risk and making full use of the existing EU tools and instruments like foreign and direct investment screening.

- ***Europacable recommends for EU legislators to actively involve European cable system producers in the development and implementation of the “Cable Security Toolbox” to ensure maximum efficiency and effectiveness.***

## **2) Enhancing the Resilience of the power grid**

### **a) Fast repairs through mandatory repair service agreements**

Already today, repair service agreements ensure rapid repair of subsea power cable assets to minimise downtimes. In view of the increased risks, maintenance and repair service agreements between operators and suppliers need to be reviewed and upgraded. Given the complexities of repair execution, which depend on availabilities of vessels, certified staff, spare parts, permitting and weather conditions, mandatory long-term repair service agreements should mirror today’s increased security needs and associated performance levels as defined by Operators. In return, EU and member states through their national regulators need to ensure that Operators can recover the OPEX cost incurred from using available market solutions offered and developed by the supply industry to ensure a cost-effective repair system for Europe.

***As already stated above, Europacable recommends that:***

- ***Operators should define the specific repair capacities needs and associated level of performance they consider relevant for their specific assets. The European industry will then meet these requests by proposing technologies and market solutions;***
- ***Where possible, regional harmonisation of performance needs on top of existing performance service level agreements should be considered; and***
- ***OPEX compensation and/or incentive schemes at national level via national regulators should be foreseen to compensate operator’s expenditures supported by EU level where possible to enhance the level of performance available on the market.***

### **b) Strategic stockpiling of grid essentials**

Already today, operators, asset owners and/or suppliers keep stock of subsea power cables deployed in existing assets. Subsea power cables and systems, notably at high (HV) and extra high voltage (EHV) levels, are bespoke to respond to the specific needs of the individual project specifications. Therefore, Europacable does not believe that it is feasible to pool any spare parts at regional or Sea Basin levels. Also, whilst for lower voltages, universal joints are available for Alternating Current (AC) assets, EHV Direct Current (DC) projects require tailor-made cable solutions and hence bespoke jointing.

- ***Europacable recommends for operators, asset owners and supplying industry to review current spare part stockage practices to assess whether minimum requirements should be regulated per asset at EU or member state level.***

### **c) Repair Vessels to be made available through service level agreements**

Until today, the high reliability of subsea power cable assets and the low number of cable incidents have not required dedicated vessel availabilities to ensure timely repairs in case of outage. In view of the projected increase of subsea power cable assets – and the scenario of increased intentional damages inflicted upon subsea assets – repair vessel availability across all European sea basins needs to be increased. Europacable strongly believes that increasing repair vessel availability should be left to market solutions: The implementation or expansion of appropriate repair service agreements between asset owners and cable systems providers will be the most viable, effective and sustainable solution for the European authorities, member states, regulators and operators. Where repair service agreements are already in place, these existing solutions should be tailored to the new reality. In the absence of agreements, these should be introduced in the shortest possible delays.

Europacable wishes to underline that the fundamental technical differences between subsea power and telecommunication cables require dedicated recovery and repair vessels as well as tools, skilled resources and specific engineering. It will not be efficient to combine repair approaches, including through mobile repair units.

- ***Europacable members object to the idea of establishing a multi-purpose EU Cable Vessels Reserve Fleet in the medium term. The required availability of dedicated power and telecommunication repair vessels shall be arranged through service level agreements between operators, asset owners and supplying industry partners.***

### **3) Enhancing Europe's Energy Security**

Increased investments in strengthening and further integrating the power grid in Europe are not only essential to enhance energy security but also critical to ensure more affordable energy from renewable sources. To reach our net zero targets for transporting energy it is essential to secure the European manufacturing of power grid equipment, including power cables.

- ***Europacable recommends that power cables must be consistently recognised as clean technologies on equal footing with all strategic net zero technologies in accordance with the scope of the NZIA Regulation and its implementing legislation. This consistent recognition should be reflected across all current and upcoming EU legislation and initiatives, including the Clean Industrial Deal, Cohesion Policy, Innovation Fund, MFF, European Grids Package, Industrial Decarbonisation Accelerator Act, EU Public Procurement Directives etc.***

**Europacable is committed to work closely with the European Commission, member states, regulators and operators to enhance the security and resilience of subsea power cable infrastructures in the short and medium term.**

#### **For further information please contact:**

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#### **About Europacable**

Europacable is the voice of Europe's leading wire and cable producers. High-quality, sustainable power and telecommunication cables, produced by our members in Europe, empower the electrification and digitalisation of our societies. Founded in 1991, Europacable represents the largest cable makers in the world providing global technology leadership, as well as highly specialized small- and medium sized businesses from across Europe.

With our future being ever more electrified and digitalised, cable technology will be the core backbone of Europe's energy and telecommunication infrastructures. Sustainable, low-carbon manufacturing and high-performance cables are essential to achieve Europe's climate neutrality objectives by 2050. Europacable is committed to the principles of free enterprise and fair trade. Our members employ over 80.000 people of which more than 50% in Europe, generating a worldwide turnover over € 70 billion in 2024. Europacable is a member of CurrentOS, EuroFSA, FEEDS, Orgalim, RGI, WindEurope and a partner of CENELEC and EUEW. Europacable is listed in the European Commission's Transparency Register under 453103789-92. [www.europacable.eu](http://www.europacable.eu)