



# **BEREC CONSULTATION**

**Vodafone Supplementary Paper to the public  
consultation on the draft BEREC Report on  
submarine cables connectivity in Europe**

**July 2025**



## **Vodafone Strategic Position on Submarine Cable Infrastructure**

### **Executive Summary**

Vodafone welcomes BEREC's initiative to assess the state of domestic submarine cable infrastructure across Europe. As a major stakeholder in global subsea connectivity, Vodafone supports BEREC's efforts to map infrastructure, identify regulatory gaps, and promote resilience. This document outlines Vodafone's strategic and policy recommendations, and technical contributions to the resilience, security, and governance of submarine cable infrastructure in Europe.

### **Strategic Importance of Subsea Cables**

Submarine cables are the backbone of global communications, carrying 98% of international internet traffic and facilitating \$10 trillion in daily financial transactions. They are critical for economic resilience, national security, and societal continuity. Vodafone's extensive subsea cable network, comprising over 80 cables spanning 1 million kilometres and connecting 100 countries, underscores the strategic importance of this infrastructure.

### **Vodafone's Contribution**

Vodafone is a significant stakeholder in global subsea connectivity. We manage around 80 subsea cables over 1 million kilometres connecting 100 countries. Investments in projects like the 2Africa and Kardessa Black Sea cables enhance connectivity and resilience, with 2Africa boosting capacity between Europe and Africa by 50%.

Vodafone contributes to resilient international connectivity for Europe through its diverse infrastructure, comprising subsea cables, mobile and terrestrial networks, and satellite communications. We actively collaborate with national security agencies to understand and stay ahead of threats. We invest in regular maintenance and proactive monitoring of cable health to minimise disruptions. If a subsea cable is disrupted, Vodafone uses advanced routing techniques and redundant pathways, to allow rapid data rerouting and minimise impact on our customers.

## **Policy Recommendations**

### **1. Harmonised EU-UK-NATO Approach**

Vodafone urges BEREC to promote a harmonised regulatory approach for submarine cables, aligned with the NIS2 and Critical Entities Resilience Directives. A common EU-UK-NATO approach is essential to ensure the resilience and security of transatlantic and intra-EU connectivity.

### **2. Streamlined Permitting and Governance**

Streamlined permitting processes and consistent governance are crucial for the timely deployment and maintenance of submarine cables. Vodafone recommends the establishment of a common framework for market analysis and SMP designation to avoid inconsistent regulatory approaches.

### **3. Public-Private Cooperation and Voluntary Incident Reporting**

Strengthening the resilience of submarine cables requires robust collaboration between public authorities and private operators. Vodafone supports the creation of a voluntary and secure incident



reporting mechanism for subsea cable disruptions. This mechanism would enable operators to share key information such as the location of affected infrastructure and root cause analyses, with relevant EU, UK, and NATO authorities. By integrating private sector insights into national and EU-level situational awareness platforms, and investing in seabed monitoring technologies, stakeholders can collectively enhance maritime awareness and develop shared lessons learned to improve overall resilience.

#### **4. Funding Mechanisms for Redundancy**

Vodafone advocates for the establishment of a dedicated EU resilience fund for critical infrastructure, with eligibility based on redundancy, cross-border connectivity, and security enhancements. Funding should be channeled through the Connecting Europe Facility (CEF), the European Defence Fund, and NATO innovation instruments.

#### **5. Repair Vessel Capacity and Market Entry**

Vodafone highlights the global shortage of cable repair vessels and the operational complexity of repairs. Delays of up to six months have been reported, exacerbated by pre-booked commercial projects, and limited emergency availability. Vodafone supports measures that encourage new entrants into the European cable installation, maintenance, and repair sector. This would increase overall capacity and help reduce costs. In the event of multiple critical incidents, Vodafone advocates for a virtual pooling of repair capabilities, whereby Member States with sovereign repair assets collaborate to prioritize deployment to the most critical infrastructure.

#### **6. Strategic Autonomy and Growing Influence of Hyperscalers**

European governments must assess whether strategic autonomy requires a minimum number of European-owned or -controlled transatlantic cables. Targeted support should be provided to ensure a competitive and resilient subsea cable ecosystem.

#### **7. Enhanced Cable Landing Station (CLS) Security and Resilience**

Vodafone supports targeted public investment to enhance the physical and operational security of subsea cable infrastructure, particularly at critical nodes such as manholes, beach landing stations, and Cable Landing Stations (CLS). These assets are essential to Europe's digital sovereignty and economic resilience, yet many were constructed before the emergence of modern hybrid threats and lack adequate protections. Investment should focus on:

- End-to-end physical security, including intrusion detection and hardened enclosures.
- Power redundancy and sustainability, with backup systems and green energy integration.
- Upgraded surveillance systems to reduce response time to physical intrusion.

### **Conclusion**

Vodafone is committed to working with BEREC and all key stakeholders to implement these recommendations and enhance the resilience, security, and governance of submarine cable infrastructure in Europe. We look forward to continued collaboration and dialogue to ensure that Europe's digital infrastructure remains robust and secure.