

BREKO Position Paper on the Draft BEREC Report on submarine cables connectivity in Europe

Submarine cable infrastructure is a cornerstone of Europe's digital backbone. With data traffic continuously increasing, its strategic relevance is growing rapidly. BREKO welcomes that this awareness is now also reflected at the European level.

In this position paper, we highlight three key aspects that deserve particular attention in the ongoing debate: redundancy, prevention and repair measures, and the protection of sensitive infrastructure data.

Redundancy as a Pillar of Submarine Cable Security

In its draft report on submarine cables connectivity in Europe BEREC correctly highlights that in certain situations **public funding may be needed** to ensure the connectivity of the national territories, as the business models may not allow the private sector to recover investments. It further states that public funding instruments are vital for assuring connectivity goals associated with submarine cable deployment and security as well as the renewal of existing aging submarine cables.

BREKO agrees with this assumption in light of the infrastructure's growing importance and the in parallel increasing insecure geopolitical situation. Even though there is no 100 percent possibility to prevent physical attacks on submarine cables completely, the best possible effort should be made to prevent damage. For this purpose, **measures ensuring that core network operations can be maintained in the event of a temporary failure of a submarine cable connection – as for example creating redundancies – should be supported.** The current damages of submarine cables in the Baltic sea have shown that with sufficient redundant infrastructure it will be possible to reroute data traffic without sacrificing performance. Nevertheless, building redundant infrastructure comes with large costs for which more EU funding should be made available. This is of even greater importance having in mind that the majority of new submarine cables are built or financed by hyperscalers.

Support for prevention and repair measures

In addition, **it would be beneficial if EU funding was also available for initiating repair and prevention measures e.g. increasing the number of repair vessels and equipping the submarine cable infrastructure with sensors** that recognize if objects approach the cables. With the lastly mentioned and in combination with data from sensors with AIS information from approaching vessels on the sea, it will be easier to monitor and recognize possible attacks at an early stage and to send repair vessels off as early as possible. This is especially of importance in cases where the incident occurs rather far away from coastal areas. Furthermore, we'd welcome a supervision and monitoring of submarine cables and possible incidents. This is especially of importance for international waters that do not fall within the jurisdiction of the member states. Against this background, BREKO welcomes that BEREC highlights the importance of a monitoring in combination with sensors in its report.

Protection of Sensitive Infrastructure Data

Lastly, BREKO would like to draw attention to further measures related to the infrastructure's security: In BREKO's view, it should be considered in how far information on infrastructure should be made available for the general public. **At least for infrastructure connecting submarine cables with onshore networks (landing stations), it should be refrained from making georeferenced data available to the general public.** Information sharing should be restricted to the smallest possible group of authorized parties.

Concerning the onshore infrastructure, it is important that companies that operate these critical infrastructures do not have to transmit geo-referenced information to the Single Information Point in the first place. This is because any data transmission and storage at different locations poses an increased security risk.

Conclusion:

BREKO supports BEREC's recognition of the strategic role of submarine cables and encourages further concrete steps to strengthen Europe's digital resilience. We call for targeted EU funding not only for infrastructure deployment but also for redundancy, repair capacity, and SMART cable technologies. In addition, we advocate for a careful approach to data transparency to avoid exposing critical infrastructure to unnecessary risks. With these measures, Europe can ensure that its submarine cable infrastructure remains secure, resilient, and future-ready.

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