The EU security check: embedding internal security implications across EU policy

Introduction

The EU's internal and external security dimension is not a stand-alone issue, but affects or is affected by various EU policy areas. As becomes clear in the Commission's Security Union Strategy, security is an essential precondition for the effectiveness of EU policies and has implications for all parts of society. States, terrorist actors and serious and organized crime groups do not shy away from using all kinds of means to destabilize and put pressure on European societies, democracy, institutions and its professionals through violence, corruption, instrumentalization of migration, disinformation, cyber and hybrid attacks. Over the past decades, the world has become more unstable and the EU should step up its efforts to combat existing and future threats. Security is a prerequisite for a functioning internal market, healthy trade, to safeguard the rule of law and, therefore, for a strong EU for all its citizens.

The complex and interconnected threats from within and outside the EU requires embedding security firmly into all relevant EU policies, including in areas that stretch beyond traditional security issues, such as the Single Market, competitiveness, supply chains, education, research and climate and environment. As the Security Union Strategy rightfully states: *all policies need a security dimension*. The reality is that external security and internal security are interconnected. We must therefore strive <u>to strengthen and integrate the awareness about both internal and external security threats and risks systematically in all EU policy domains and decision-making processes and account for possible impact on the Union's security.</u> This requires effort across the spectrum of EU internal security policy, the Common Foreign and Security Policy (including the Common Security and Defence Policy), and on the nexus between them. This paper will focus primarily on the internal security dimension.

Proposals for an ever more comprehensive approach to security

The EU needs to structurally invest in a more comprehensive approach to security, jointly address threats and risks, and boost resilience of its economy and society. We cannot afford fragmentation and lack of coordination. The Netherlands therefore proposes the following:

More focus on horizontal coordination
1. Strengthen horizontal coordination with dedicated capacity on internal security under the Secretary General, adding a cross-sectoral pivot point to advocate for preventing negative security impact of activities in non-security policy domains, when necessary.

Security as a priority
2. Similar to environmental concerns, security should become an integral consideration in all policy domains, with instruments similar to climate proofing to ensure systematically that new policy does not negatively affect the internal security of the EU.
3. All impact assessments should include an overview of how security is impacted by new EU legislative proposals. This should include direct impact on the Union's security interests but also potential other (negative) spillover effects, such as criminal abuse of legislation. This may include, but is not limited to, themes such as border security, increased risk of hybrid and cyber threats to critical infrastructure, emerging technologies, smuggling, etc.

Connect the dots
4. The Commission should propose a new Security Union Strategy for 2025-2030 to account for the changed strategic context, including addressing 'new' threats such as anti-institutional extremism and challenges such as risk-bearing strategic dependencies, and actively promote its visibility and follow-up.
5. Other areas where updated or new legislation could boost effectiveness are going dark, data retention, CBRN and modernising the anti-drug trafficking instruments.
6. The strategy should ensure a whole-of-Commission/EU approach to security, coordinated with initiatives on external security, such as the Council's Strategic Compass, addressing the aforementioned security threats. This coherence and coordination between the relevant instruments and actors is needed to address the variety of security threats the EU faces in and outside of its territory.
7. Keep Member States and EU institutions, bodies and agencies informed, engaged and committed to the implementation progress on the Strategy by organizing regular dialogues. The Council's Committee on Operational Cooperation on Internal Security (COSI) would be a good forum to realize a concrete and strategic discussion of the Progress Reports by the Commission, in coordination with the Political Security Committee (PSC) to ensure alignment between the internal and external dimension of security. The existing joint COSI/PSC structure could be used to identify gaps in policy and implementation and develop a road map to address these.

Background: current developments and challenges

Fragmentation
As security has implications for all parts of society and all public policies, many actors are responsible for (a part of) the Union's security interests: DG CNECT when drafting digital- and cyber legislation, DG DFIS and the High Representative for Common Foreign and Security Policy or DG TRADE when strengthening the EU's economic security. Traditionally, the Directorate General for Migration and Home Affairs (DG HOME) is the main driver behind the EU's work on internal security. The consequence of this fragmentation is that, in the current structure of the Cabinet of Commissioners, security has to compete for attention and resources.

Security as an afterthought
EU efforts primarily aimed at promoting the interests of other sectors, like the economy, can have an important impact on our internal security. Subjects such as acquisition of raw materials, increasing accountability of online services, undersea infrastructure and the development of large language models have an impact on security and illustrate the need to embed security considerations in all EU policies. In a world where European societies are ever more subject to (geopolitical) threats, failing to anticipate security risks in the first stages of policy development can come at the detriment of our societies instead of strengthening them. And, mitigating measures can only be taken after the fact. This often leads less effective options. The negative impact is not always immediate, but could, for example, result in law enforcement agencies being impeded when they fight crime, or actors with ill intent that abuse legislation meant to promote, for instance, renewable energy. Preventive barriers and enforcement measures need to be put in place. Preliminary awareness of security implications of these instruments can guarantee the safeguarding of the Union's security interests at an earlier stage, improving the effectiveness, reliability and positive impact of EU policies.

Coordination
The new Commission should improve the inherent embedding of security considerations in all sectors: sin the same way the creation of the EU counter terrorism coordinator has helped a more focus and integrated EU effort against terrorism. The Netherlands would welcome active, horizontal coordination on security by the Commission across all policy areas, to ensure a proper interaction with other societal interests and required policy follow-up.

Connecting the dots
The EU Security Union Strategy 2020-2025 is part of the EU's broader efforts to bring together all these initiatives. It provides an excellent overview of the security ecosystem and identifies priorities where the EU can bring value to support Member States in fostering security for their citizens. Since its adoption, new threats (such as anti-institutional tendencies) have emerged. The changing landscape emphasizes the need for a follow up on this strategy by the Commission.

Despite its merits, added value, and potential, in practice the Security Union Strategy seems to be overlooked by its stakeholders, the member states. Excellent progress reports have been issued, but the proposed joint debates with the EU institutions to take stock of progress achieved while looking together at the challenges ahead, have as yet failed to materialize. This is a missed opportunity for Member States to horizontally link EU initiatives and developments to their own unique national settings, and in return reinforce the EU priorities.

When connecting the dots, we must also make sure that our external and internal efforts reenforce each other. The two security dimensions are clearly linked; when terrorist organizations plot attacks from outside the EU, when large quantities of illicit drugs arrive from Latin-America into European ports and gang violence ensues or when hybrid attacks from other states affect European elections. Also, policy decisions in third countries may have a direct impact on our security. For example, the conditions in which multinational tech companies can operate worldwide has an impact on how the EU can address child sexual abuse material or terrorist content online. EU foreign (security) policy can be essential to help address, or prevent, internal security issues. Therefore, coherence between the EU Security Union Strategy and foreign security policy needs to be ensured where relevant.

Despite regular efforts to bring external and internal security discussions together within the Council and the Commission – by organizing joint meetings of the PSC and COSI or within the European Council and via interservice cooperation – EU external and internal security policies are not integrated and coordinated enough. The Netherlands believes that the joint COSI/PSC format could and should be used more effectively. A action-oriented dialogue based on the progress reports of the Security Union strategy could help boost these discussions and work towards concrete measures to address any shortcomings as identified in the progress reports. Furthermore, a shared situational awareness and understanding of the various threats towards EU security can improve the effectiveness and timeliness of a joint response, identifying what steps to take and who should take them.