Alliance for European Autonomous Access to Space

From EU Soil to Outer Space: Regulation as an enabler for Spaceports

AEAAS DATA MANAGEMENT PLAN - FIRST VERSION

September 2026

Deliverable D1.2

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PART I. PROJECT ID AND SUMMARY

Acronym: AEAAS – Alliance for European Autonomous Access to Space

Title: From EU Soil to Outer Space: Regulation as an enabler for Spaceports

Project No.: 101295883

Responsible Unit: HADEA/B/04 || **Project officer:** Athanasios PETRIDIS

Call: HORIZON-CL4-2025-02 submitted for HORIZON-CL4-2025-02 / 25 Sep 2025

Topic: HORIZON-CL4-2025-02-SPACE-11 - CSA on access to European spaceports

Type of Action: CSA (Call for Support Action)

Key Words: Sovereignty; Interoperability; Spaceports; European Union; Sustainability; Safety; New Space Economy; Launching Operation(s); Resilience; Independent Capabilities; Reliable Access; EU Space Policy.

Duration: 12 Months

Official Project Start Date: **01/07/2026**

Limit for Project End Date: **30/06/2027**

Members of the Consortium:

No.	Designation	Legal Name
01	Abreu	ABREU & ASSOCIADOS - SOCIEDADE DE ADVOGADOS, S.P., R.L.
02	ASC	ATLANTIC SPACEPORT CONSORTIUM, LDA.
03	CST	COMMERCIAL SPACE TECHNOLOGIES LIMITED
04	Reflect	REFLECT SOLUTIONS LIMITED
05	HKLW	HEUKING KUHN LUER WOJTEK PARTNERSCHAFT MIT BESCHRANKTER BERUFSHAFTUNG VON RECHTSANWALTEN UND STEUERBERATERN
06	Alpha	ALPHA IMPULSION SAS
07	ASTech	ASSOCIATION ASTECH PARIS REGION
08	Stellar	STELLAR KINETICS LIMITED
09	HyImpulse	HYIMPULSE TECHNOLOGIES GMBH
10	Impulso	IMPULSO.SPACE SRL
11	Isar	ISAR AEROSPACE SE
12	Borie	BORIE CONSEILS EXPORTS SAS
13	PTSpace	AGENCIA ESPACIAL PORTUGUESA - PORTUGAL SPACE
14	DLR	DEUTSCHES ZENTRUM FUR LUFT - UND RAUMFAHRT EV

PART II. DATA SUMMARY

Section 1. Data Generation / Re-Use

Throughout its 12 months duration, project AEAAS will generate data as a result of the collection of pre-existing regulatory and legal data, including legislation, regulatory instruments, policy documents, official guidance, standards, soft law instruments, licensing procedures, regulatory templates, incentive programmes, and other materials relevant to the review of spaceport regulation across the jurisdictions covered by the Project.

This data will be collected, processed and built upon to produce project outcomes and results, as described in Table 1, below.

Table 1: Non-personal data generated within the execution of project AEAAS

Data	Type	WP	Purpose	Size
Access to Space policy and jurisdiction best-practices	Matrices, tables, classifications, summaries, jurisdictional comparisons, regulatory key item mappings	2, 3 and 4	State-of-the-art validation and best-practices assessment by relevant stakeholders. Used in the preparation of D2, D3 and D4.	Data relating to more than 40 jurisdictions. **File/Folder Size:** 1.17 Gb
Jurisdiction KPI and assessment metrics	KPI definitions, scoring approaches, assessment criteria, outcome indicators, pathway indicators, gap analysis inputs, best-practice selection data	3	Evaluation of jurisdiction performance. Used in the preparation of D3 and D4.	Data relating to more than 20 KPIs with over 90 data entries. **File/Folder Size:** 309 Kb
Stakeholder engagement data	Responses, feedback forms, consultation inputs, workshop notes, event attendance data, registration information, comments	5	Required to obtain in-depth information on jurisdictions and access to space policy.	More than 400 unique stakeholder entries.

Data	Type	WP	Purpose	Size
	received from stakeholders		Used in the preparation of D3 to D6	**File/Folder Size:** 209 Kb
Dissemination, exploitation and communication (DEC) results	Website analytics, newsletter metrics, social media engagement data, event participation metrics, download statistics, communication materials, publication records, and other evidence	6	Necessary to measure project's outreach. Used in the preparation of D7 and D8.	Unknown[1] **File/Folder Size:** TBD[1]
Project management and quality monitoring	internal progress matrices, review logs, comment-resolution tables, quality issue logs, risk register updates, meeting minutes, action lists, deliverable review records, etc.	1	Necessary for the ensuring timely delivery with quality of the projects results. Used in D1 and Periodic Reports	Unknown[1] **File/Folder Size:** TBD[1]

The Consortium will also process personal data in the context of stakeholder engagement, event registration, mailing lists, survey participation, meeting participation, project administration and contact management. Such data may include names, professional email addresses, organisation, role or function, country, sector, attendance records and professional opinions provided in the context of the Project.

Table 2: Personal data generated within the execution of project AEAAS

Data	Type	WP	Purpose	Size
Stakeholder personal data	Names, professional email addresses, organisation, role or function, country, sector, attendance records and professional opinions	2, 3 and 4	Required for the organisation of events and gathering of experienced feedback	More than 400 unique stakeholder entries. **File/Folder Size:** 209 Kb

[1] Not completed at the time of publication of the present version of the Data Management Plan.

Section 2. Data Origin

Table 3: Origin of the data generated within the execution of project AEAAS

Data	Origin / Provenance
Access to Space policy and jurisdiction best-practices	Official national and international repositories and government gazettes
Jurisdiction KPI and assessment metrics	Consortium
Stakeholder engagement data	Stakeholders
Stakeholder personal data	Stakeholders
DEC results	Consortium
Project management and quality monitoring	Consortium

Section 3. Data Utility

The spaceport ecosystem (spaceport operators, launch services providers, providers of brokerage and intermediation, vehicles and infrastructure manufacturers, and public entities involved in licensing and oversight) are expected to benefit and uptake the results of the project.

The European and international Institutions, as well as national Regulators are expected to uptake the results of the project. The Project will produce fully accessible scientific knowledge (from legal review to regulatory proposals, including impact analysis in D.1. through D.8.) and the regulatory proposal will foster innovation in rapid deployment technologies and interoperable space systems, advancing Europe's competitiveness and leadership in aerospace research.

PART III. FAIR DATA

Section 1. Making data findable, including provisions for metadata

Project data shall be organised in a structured manner, using clear file names, version control and repository folders. Where datasets are made publicly available, they shall be accompanied by sufficient metadata to allow identification of their content, origin, date, scope and responsible partner.

Where possible, Project datasets shall be stored in commonly used and machine-readable formats, such as .xlsx, .csv, .docx, .pdf, .pptx or other appropriate formats. Regulatory mapping and KPI tables should use consistent terminology, categories and identifiers across Work Packages to support comparison and reuse.

All Project Deliverables and supporting documents shall be managed through the shared document repository established under T3.1. The purpose of version control is to ensure traceability, avoid duplication, preserve review history and identify the final submitted version of each Deliverable. The following version control principles shall apply:

a) Each Deliverable shall have a unique file name identifying the Project, Deliverable number, short title, version number, date and status.
b) Drafts shall be numbered progressively, using version numbers such as v0.1, v0.2, v0.3 and so forth.
c) The version submitted to the European Commission shall be identified as v1.0 or as the "submitted version".
d) Where a submitted Deliverable is later amended, the amended version shall be numbered v1.1, v1.2 or equivalent, with a clear description of the changes.
e) Tracked changes or comment records shall be preserved during the review phase, unless the Coordinator determines that a clean version is required for circulation.
f) The final submitted version shall be stored in PDF and, where appropriate, editable format.
g) Review records, comment-resolution tables, annexes and supporting documents shall be stored in the relevant Deliverable folder.

The Coordinator and WP Co-Leaders shall ensure that outdated drafts are not confused with approved or submitted versions. All partners shall use the shared repository as the authoritative location for Project documents.

Section 2. Making data accessible

Repository

The Consortium shall make public Project outputs openly available, subject to applicable Intellectual Property (IP), data protection and security restrictions. Public Deliverables shall be made available through the Project website and, where appropriate, through trusted repositories.

Where public datasets or supporting materials are deposited in an external repository, the final version of the DMP shall identify the repository, access conditions, licence, metadata and preservation period.

The Consortium has yet to select the appropriate repository, but tools such as Zenodo and OpenAIRE are being analysed.

Data

The Consortium shall make public Project outputs openly available, subject to applicable intellectual property, data protection and security restrictions. Public Deliverables shall be made available through the Project website and, where appropriate, through trusted repositories.

Supporting materials, drafts, WIP versions and other ancillary materials, including Consortium internal communications will not be publicly shared due to the legitimate interest in the members of the Consortium to safeguard their know-how and business information.

Where public datasets or supporting materials are deposited in an external repository, the final version of the DMP shall identify the repository, access

conditions, licence, metadata and preservation period. The Consortium has yet to select the appropriate repository.

The Consortium shall make public Project outputs openly available, subject to applicable intellectual property, data protection and security restrictions. Public Deliverables shall be made available through the Project website and, where appropriate, through trusted repositories. Where public datasets or supporting materials are deposited in an external repository, the final version of the DMP shall identify the repository, access conditions, licence, metadata and preservation period. The Consortium has yet to select the appropriate repository.

Within the Consortium, each Party shall be responsible for implementing their own access control measures. In relation to data that is public, the Consortium will not seek to ascertain the identity of those who access information on a continuous basis.

Metadata

All results uploaded onto repositories shall be subject to the following principles:

a) Each Deliverable shall have a unique file name identifying the Project, Deliverable number, short title, version number, date and status.
b) The final submitted version shall be stored in PDF and, where appropriate, editable format.
c) Metadata will include URL for location and accessibility.

Project data shall be retained for the period required under the Grant Agreement, Consortium Agreement and applicable legal or audit obligations.

At the end of the Project, the Consortium shall identify which materials shall remain publicly available, which shall be retained for internal audit and verification purposes, and which shall be deleted or anonymised in accordance with applicable data protection and confidentiality requirements.

Section 3. Making data interoperable

Where possible, Project datasets shall be stored in commonly used and machine-readable formats, such as .xlsx, .csv, .docx, .pptx or other appropriate formats. Regulatory mapping and KPI tables should use consistent terminology, categories and identifiers across Work Packages to support comparison and reuse.

With regards to the inclusion of qualified references, dependencies and links between Consortium Partners, their tasks and the pipeline of task to input to deliverable have been carefully and intentionally included in the Consortium's proposal. Cross-references to data previously collected or generated in the Project is crucial to all steps of the Project.

Section 4. Increase data re-use

Public project results shall be prepared in a manner that facilitates reuse by regulators, industry stakeholders, researchers and policy actors. Where appropriate, datasets and public Deliverables shall include sufficient context, methodology, definitions, limitations and attribution information to allow future users to understand and reuse the results.

The Consortium shall make public Project outputs openly available, subject to applicable intellectual property, data protection and security restrictions. Public Deliverables shall be made available through the Project website and, where appropriate, through trusted repositories.

The Project shall promote open access to publications and public results in order to facilitate uptake by regulators, public authorities, industry stakeholders, researchers and civil society. However, open access shall not apply to personal data, confidential information, commercially sensitive data, restricted partner information, or information that cannot be disclosed due to legal, security or contractual limitations.

With regards to future usage, the Consortium believes that the generated data could be reused by other projects working on Space Policy. The Consortium also



believes that the generated data could contribute to the definition of an EU Common Space Law.

PART IV. OTHER RESEARCH OUTPUTS

Project AEAAS will not generate other research outputs than what has been described in the previous sections.

PART V. ALLOCATION OF RESOURCES

The consortium has not identified any costs associated with making data outputs, with the exception of the costs of carrying the Project, as described in the Budget tables.

In case further resources are needed for the purpose of making data outputs publicly available, the Project Coordinator and the AEAAS data management responsible, i.e., Abreu and ASC, respectively, will support the costs and split them in equal shares.

Where public datasets or supporting materials are deposited in an external repository, the final version of the DMP shall identify the repository, access conditions, licence, metadata and preservation period.

PART VI. DATA SECURITY

Each Beneficiary shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk presented by the processing operations for which it is responsible under the Project.

The Project does not involve Classified information, thus not warranting special EU security clearance for access by external entities.

Where public datasets or supporting materials are deposited in an external repository, the final version of the DMP shall identify the repository, access conditions, licence, metadata and preservation period. The Consortium has yet to select the appropriate repository, but it is looking at tools such as OpenAIRE or Zenodo.

PART VII. ETHICS

Project AEAAS does not raise any particular ethical issues that could impact project data sharing.

With regards to the informed consent on personal data gathering, this has been put into place and will be monitored for all project activities where such gathering may occur (see Part II).

PART VIII. OTHER ISSUES

At the moment of the submission of the present deliverable, there are no other issues to report.

If any issues regarding data management, including risks associated with data handling or misuse, these will be flagged by the beneficiaries of the project and included in an updated version of the present report.

This DMP shall be treated as a living document. It may be updated whenever there is a material change in the type of data collected, the use of stakeholder input, the publication strategy, the storage location, the applicable access conditions, or the data protection assessment.

DOCUMENT INFORMATION

Version: 1.1 (*Public Version*) | **Date of Latest Update:** October 20th, 2026

Author(s): AB + ASC

Approved by: General Assembly

First version submitted to EC on September 30th, 2026.

Table of Changes:

Date	Description of Changes	Approved by
17.08.2026	First Draft	AB
28.09.2026	Revision of all sections	ASC
30.09.2026	Submitted to EC	ASC
20.10.2026	Updated deliverable template	ASC

Distribution List (Level of Dissemination of the Document)

This Data Management Plan (DMP) shall be made available at the AEAAS internal SharePoint to all beneficiaries, associated partners and to the European Commission, through the HaDea Project Officer, as well as made Public through the AEAAS website.