

By email
20th May 2026

Dear Chair and Members of the Joint Committee on the National Security Strategy,

It was a privilege to attend as a witness the Committee's evidence session on undersea cables on 18 May, I wanted to send my thanks, and provide a supplementary note from an industry perspective particularly focussing on the Government's response to the Committee's previous report, particularly in areas where I do not feel the session fully explored the progress that has been made since the report was published.

Progress since the publication of the JCNSS report and Government Response

From the perspective of the European Subsea Cables Association (ESCA), there has been a noticeable increase over the past year in the level of engagement, coordination and strategic attention being given to subsea cable resilience across government.

In particular, DSIT has continued to provide an effective and well-understood focal point for industry engagement, including through the Subsea Communications Cable Industry Group (SCCIG) and a number of dedicated working groups examining specific technical and operational issues. This ongoing engagement is extremely valuable given the highly specialised and technically nuanced nature of the subsea cable sector – and it cannot be understated that there are no simple solutions to complex challenges in this area.

There has also been positive progress in relation to the review of legislation affecting subsea cables, landing station security engagement, monitoring technologies, and wider coordination mechanisms across government. Industry involvement in these discussions is important to ensure that any future measures are operationally workable and avoid unintended consequences for the wider marine environment and cable ecosystem, and DSIT has established focus working groups to gather technical perspectives to support their legislative review and policy development.

Industry has also supported incident response coordination activity and exercises intended to improve understanding of how government and operators would work together during a developing subsea infrastructure incident. This type of engagement is imperative in strengthening practical resilience arrangements and improving coordination across stakeholders – which is a significant area of improvement.

More broadly, the establishment of the Undersea Infrastructure Security Oversight Board is welcome in providing a focal point for cross-government coordination on subsea infrastructure matters. As noted during the Minister's session, industry is not currently part of this, and as this develops further, it will be valuable for industry to gain greater understanding of the Board's overall direction, priorities and objectives, while of course we recognise that detailed operational discussions may appropriately remain within government.

As such, the parallel existing sector engagement forums and working groups may continue to provide an effective mechanism for this dialogue. From an industry perspective it is important that there remains a clear pathway for strategic engagement and feedback between government and the sector.

Reflections on the Ministers' Evidence

The Ministers' evidence to the Committee for me reflected the positive direction of travel in the Government's approach to subsea infrastructure resilience, particularly in relation to cross-government coordination, international engagement and recognition of the increasingly strategic nature of subsea infrastructure.

From an industry perspective, it has been encouraging to see increasing coordination with international partners, including NATO allies, European states and neighbouring countries such as Ireland, recognising the inherently international nature of the subsea cable ecosystem and maintenance model.

At the same time, many of these initiatives will need progress with greater pace given the increasing strategic importance of subsea infrastructure and the long lead times associated with infrastructure development, repair capability and marine planning processes.

This is particularly relevant not just in security arrangements, but also in areas such as marine spatial planning, engagement on the future of maintenance and how governments are involved in those structures, and where decisions being taken today may shape resilience and connectivity options for decades to come. We see this as an area that would benefit from greater focus.

The ministers' evidence also appropriately reflected that resilience is not solely a question of vessel ownership/sovereignty, but also involves personnel, operational availability, maintenance structures, insurance considerations and the ability to operate during periods of heightened tension or uncertainty. In addition, the international nature of the cable repair ecosystem means that this should not be considered in isolation for the UK, but should also be a topic of engagement with European countries, the European Commission, Ireland, USA, Canada and other international partners.

Industry also strongly recognises the importance of preparing proportionately for low-probability but potentially high-impact scenarios involving coordinated disruption to subsea infrastructure – and where the different roles lie for the sector and for governments.

Strategic Planning and Future Infrastructure

Industry strongly welcomes the recognition within both the Committee's report and the Government response of the importance of geographic diversity in subsea cable routing and landing locations, this continues to be a priority in cable route planning and design, however with new developments on the seabed, routing is becoming increasingly constrained.

We welcome the ongoing work through The Crown Estate's Marine Delivery Routemap to safeguard strategic space for future subsea telecoms infrastructure in increasingly congested marine environments. The concept of safeguarding future telecoms access corridors is an important development, particularly as competition for seabed space continues to increase. The involvement of DSIT in this work is vital to ensure that any security considerations are built into the design, and from where the industry has visibility, we consider that security considerations are currently being managed appropriately.

At the same time, routing decisions remain subject to significant technical, environmental and commercial constraints. If there is to be a greater national strategic element incorporated into future routing decisions, it is important to recognise that the current consenting and planning framework does not always fully reflect those strategic considerations, and this is an issue that has been raised with DSIT, the MMO and Defra.

Where future routing results in higher concentrations of cables in specific areas, additional protective measures may warrant consideration, including measures relating to anchoring or other marine activity, and such no anchor/no fishing zones already exist. However, it is important

to distinguish between safeguarding future routing space, discreet areas of protection, and the creation of formal cable protection zones, which present different operational and policy considerations and risks.

Repair Capability and Resilience

The Government's measured approach regarding sovereign repair capability is, in my view, appropriate. While discussion often focuses on vessels, repair capability is ultimately a combination of ships, trained personnel, maintenance agreements, operational experience and international coordination. It is therefore sensible that government continues to engage closely with industry before determining what specific interventions, if any, may be required.

A key consideration for future policy development is the distinction between normal commercial operating conditions and scenarios involving heightened tension or hostile activity, where willingness or ability to operate offshore may become more uncertain. Advance planning and integration between government and industry can help reduce this gap and improve resilience during low-probability but high-impact scenarios – with the right solutions, there may be no gap at all with sufficient engagement and integration.

Given the inherently international nature of the subsea cable industry and maintenance ecosystem, many of these issues are also being examined collaboratively across Europe and with international partners, including Ireland and EU member states. Any future intervention should therefore carefully consider the existing international maintenance and repair ecosystem, to avoid unintended distortions to a model which currently supports repair capability across the UK and wider Europe/internationally.

Monitoring Technologies and Deterrence

Industry also welcomes the current collaborative work on cable monitoring technologies, where there are important operational and policy considerations that require careful management. The International Cable Protection Committee [published a viewpoint](#) on this topic, and DSIT has established a working group and undertaken significant activity to ensure that policy development has robust technical grounding.

In terms of deterrence, improving understanding and visibility of routine cable faults and damage can also contribute indirectly to deterrence by reducing ambiguity and making genuinely suspicious activity easier to identify – I feel that this is a small but significant point which was slightly lost in the focus of the committee report last year.

Commercial Considerations and Industry Investment

I also wanted to provide some clarification regarding a small number of comments made during the oral evidence session relating to hyperscalers, commercial ownership structures and cable investment. These broader commercial considerations were not the principal focus of the session, which was rightly centred on resilience and national security.

From an industry perspective, increased investment in subsea cables by major technology companies is generally beneficial to the overall subsea cable ecosystem. Each cable system is developed on the basis of an individual business case and operational requirement, regardless of the size or spending power of the companies involved.

Increased investment in international connectivity also directly supports the wider maintenance and repair ecosystem, as all cable systems ultimately require long-term operational support, maintenance arrangements and specialist repair capability.

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Skills, Workforce and Maritime Careers

There was also discussion during the session regarding whether subsea cable repair and offshore technical roles are sufficiently attractive professions. I would emphasise that these are highly skilled, specialist and rewarding careers which play a critical role in national resilience and international connectivity.

The challenge of encouraging more people into offshore and maritime professions is not unique to the cable sector, and is shared across the wider maritime industry and indeed the Royal Navy itself. Exploring ways to promote awareness of these careers, improve training pathways and encourage new entrants is therefore an area of clear mutual interest between industry and government, with direct implications for long-term resilience and national security.

ESCA, the SubOptic Foundation, and The International Cable Protection Committee are holding an event at the BT Tower in London on the 29th June, and we would welcome members of the JCNSS if they would like to participate to engage with the industry, and discuss ways in which skills, talent, and newcomers to the industry can be encouraged.

Closing Remarks

Finally, I would reiterate that industry strongly welcomes the increasing recognition across government of the strategic importance of subsea cable infrastructure. Continued engagement between government, operators, maintenance providers and international partners will be essential to ensure that future policy measures remain practical, proportionate and effective.

I hope these additional observations are helpful to the Committee.

Yours sincerely



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