

European Commission unveils new Economic Security Communication seeking a paradigm shift towards the use of trade instruments to support EU strategic objectives

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On 3 December 2025, the European Commission published a [Joint Communication](#) on “*strengthening EU economic security*” (the ‘**Economic Security Communication**’), outlining the long-awaited economic security announcement that has been forthcoming since as far back as President von der Leyen’s re-appointment in late 2024. In the words of Commissioner Maros Šefčovič — the member of the European Commission that leads the symbolically re-named Directorate-General for Trade & Economic Security (‘**DG TRADE**’) — the Economic Security Communication shows that the “*EU is shifting into a higher gear*” in its efforts to strengthen EU economic security.

According to the Commission, the immediate context for the development of the Economic Security Communication is the recent intensification of risks to the EU’s economic security, which although not new have become “*more visible, more pressing, and more difficult to overlook*.” These risks include growing instability in the global trade and investment environment (marked by the rise of disruptive trade measures and export restrictions to weaponize dependencies), a proliferation of predatory practices targeting critical supply chains and technologies which can create new dependencies, and the continued deterioration of the security landscape (e.g., the Russian war against Ukraine and the rise in hybrid attacks).

However, the Economic Security Communication is not a complete novelty and does not represent the first EU policy initiative in the area of economic security. In fact, the Economic Security Communication largely builds on policy groundwork laid in an earlier communication of 2023, the ‘European Economic Security Strategy’ (the ‘**Strategy**’). The Strategy set out the EU’s initial response to what the Commission had identified as new and emerging risks to the EU’s economic security, which had come into sharp focus amid growing geopolitical tensions in the years since the COVID-19 pandemic. In response to those risks, the Strategy outlined a series of actions — grounded in risk assessments — to strengthen EU economic security through three key pillars, namely promoting competitiveness, protecting against risks, and partnering with likeminded countries.

While starting from these overarching policy objectives developed in the Strategy, the European Commission has sought to use the Economic Security Communication to usher in a radical change in outlook to EU policy action — “*moving from a reactive posture towards a more proactive and systematic deployment of tools*.” To this end, the European Commission has signaled its intention to use all the tools at its disposal, irrespective of their original purpose.

Below, we provide a brief overview of the most significant takeaways from the Economic Security Communication — and which could have an impact on your business in the near future. Should you have any questions regarding the impact of these new developments, please do not hesitate to contact us.

A “proactive and targeted approach” to EU economic security

1. Immediate focus on priority “high-risk” areas

In order to give effect to the “paradigm shift” announced in the Economic Security Communication, the European Commission has identified six high-risk areas where it will concentrate its efforts in the immediate to short term. These are:

- (i) *Strengthening supply chain resilience and counteracting high-risk dependencies in critical goods and services*
- (ii) *Attracting value-added inbound investment that reinforces the EU’s economic security*
- (iii) *Supporting a vibrant defence and space industrial base and other high-risk industrial sectors*
- (iv) *Developing and maintaining leadership across critical technologies*
- (v) *Prevent access to sensitive information and data that could undermine the EU’s economic security*
- (vi) *Prevent and mitigate disruptions to EU critical infrastructure affecting the EU economy*

At the same time, the European Commission has highlighted that these areas are not exhaustive, outlining its intention to continue to monitor developments and — where needed — assess and act on newly emerging high-risk areas.

2. Doing new things with old tools

In the first instance, the most immediate concrete impact of the Economic Security Communication lies in the shift in mindset that the European Commission seeks to introduce *internally* within the EU system — as well as the message that it intends to broadcast to an *external* audience. This is reflected in the European Commission’s stated intention to adapt and re-orientate its existing tools towards the pursuit of EU economic security objectives, using them “*more strategically, efficiently and proactively*” — despite the fact that many of these tools will have been originally developed without any notion of EU economic security in mind.

To this end, the European Commission sets out a list of key tools in the text of the Economic Security Communication, which includes the full spectrum of EU instruments regulating trade with third-countries:

- Trade defence instruments (anti-dumping measures, anti-subsidy measures, safeguards)
- Foreign Subsidies Regulation
- Customs procedures and controls
- Trade agreements
- Standards-based trade
- FDI Screening Regulation
- Dual-Use Export Control
- Recommendation on outbound investment monitoring
- Anti-Coercion Instrument
- Sanctions
- Blocking Statute Regulation

Building on a strengthened analysis and governance (to be achieved through enhancing its information sources and cooperation with Member States), the EU will seek to adapt how it uses some of its tools in order to make them more effective in managing economic security risks, whilst also seeking to introduce greater cohesion in the operation of these tools. Notably, the European Commission has outlined its intention to take steps to adapt its existing trade tools

as follows:

- **FDI Screening** — the European Commission will develop guidelines based on experience gained to date in the implementation of the FDI Screening Regulation to ensure greater coherence in the implementation approach of the various Member State national screening authorities.
- **Dual-Use Export Control** — the European Commission intends to conduct an overall evaluation of the Dual-Use Export Control Regulation in 2026, in order to assess whether this adequately responds to new geopolitical and geoeconomic realities. In particular, the European Commission seeks to explore with Member States how to adopt European-level controls in emerging technology areas, and assess the impact of increasing recourse to unilateral controls on the coherence of the Single Market.
- **Trade Defence Instruments** — where a case of relevance for the EU's economic security is initiated, the European Commission intends that the EU's economic security will be reflected in the conduct of the investigation and in the design of possible measures.
- **Foreign Subsidies Regulation ('FSR')** — the European Commission states that it will seek to make full use of the FSR in areas where it considers that foreign subsidies create distortions that pose economic security risks.
- **Customs** — the European Commission will review the use of strategic customs instruments (e.g., tariff suspensions, autonomous quotas) for key inputs, with a view to supporting the competitiveness of EU companies.

At the same time, the European Commission highlights that this list is non-exhaustive, clearly indicating that the European Commission is prepared to exercise its discretion to identify further (existing) EU instruments that it can seek to leverage in pursuit of EU economic security objectives. Moreover, the European Commission has also outlined its desire to seek closer cooperation with third countries — bilaterally and under the auspices of frameworks such as the G7 and CPTPP — in order to work towards the development and deployment of economic security standards, the coordinated deployment of tools, and coalition building with partners who share similar economic security objectives or face similar challenges.

3. Completing the EU's economic security toolbox

In addition to adaptations to its current tools, the European Commission has stated that it will also seek to develop new measures to advance the EU's economic security. Most notably, these new tools include:

- **Procurement** — the European Commission will review the Public Procurement Directives to propose European preference criteria in specific strategic sectors in which “[EU] public procurement stimulates demand for European industrial leadership, increases [EU] resilience and mitigates risks for security.”
- **Blocking Statute** — the European Commission has indicated that it will review the Blocking Statute in order to deter third countries from applying extra-territorial sanctions against EU citizens and businesses, whilst also simplifying compliance.
- **Portfolio Investment** — the European Commission will monitor Member State-level portfolio investments (which fall outside the scope of the FDI Screening Regulation) in areas identified as high-risk for economic security purposes.

4. Conclusion — more to come?

While the Economic Security Communication clearly seeks to send a strong signal to internal and external observers, what it means in practice remains less clear for the time being. Indeed, although the European Commission has asserted a change in outlook as well as an intention to take steps to adapt existing tools/develop new ones, the Economic Security Communication offers little in the way of a concrete timeline for next steps (with the exception of the ReSourceEU proposal unveiled alongside the Economic Security Communication itself).

In the meantime, there are concerns that the introduction of a new policy touchstone for the implementation of longstanding EU instruments could risk creating considerable legal uncertainty for businesses already navigating an increasingly complex EU trade regulation landscape. This is not least due to the potentially boundless content of the notion of “EU economic security”, which has not yet been defined at EU level or in the Economic Security Communication itself. Most significantly, the Economic Security Communication also appears to mark a paradigm shift towards the use of EU instruments — that have traditionally been seen as ‘objective’ in nature — for what are essentially political ends. As a consequence, businesses should be prepared for a more political — and less legalistic — EU.

While Member State governments have broadly welcomed the announcement of the Economic Security Communication, certain governments have sought further clarification about plans for use of existing tools, as well as the implications for existing policy proposals.

At present, the Commission has not yet offered any firm timeline for next steps.

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