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**Dokumentation**

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**Zur Diskussion um einen Nationalen Sicherheitsrat**  
Rechtslage im internationalen Vergleich

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## 1. Einleitung

Seit den 1990er Jahren wird in Deutschland parteiübergreifend<sup>1</sup> verstärkt über die Schaffung eines Nationalen Sicherheitsrates diskutiert.<sup>2</sup> Insbesondere in **Krisenzeiten** wie der Evakuierung afghanischer Ortskräfte,<sup>3</sup> der Ahrtalflut,<sup>4</sup> der Corona-Pandemie<sup>5</sup> oder dem russischen Angriffskrieg auf die Ukraine<sup>6</sup> werden die Forderungen nach einem solchen ständigen Gremium laut, das im Kern **die deutsche Außen- und Sicherheitspolitik koordinieren** soll.

Zurzeit findet die Koordinierung der Außen- und Sicherheitspolitik – soweit sie nicht, etwa im gelegentlich einberufenem **Sicherheitskabinett**, informell zwischen den Ministerien und dem Bundeskanzleramt geschieht – vor allem

- in einer wöchentlichen **Staatssekretärsrunde** zur Vorbereitung der Kabinettsrunden statt,
- in der „**Nachrichtendienstliche Lage**“, einer wöchentlich tagenden Staatssekretärsrunde unter Beteiligung der Leiter von Bundesnachrichtendienst und Sicherheitsbehörden, sowie

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- 1 Markus Keim, „Auf dem Holzweg Die deutsche Außenpolitik leidet zwar unter vielen Defiziten. Die Einrichtung eines Nationalen Sicherheitsrats würde jedoch keine Abhilfe schaffen“, IPG vom 1. Oktober 2022, <https://www.ipg-journal.de/rubriken/aussen-und-sicherheitspolitik/artikel/auf-dem-holzweg-5462/>; *Gesprächskreis Nachrichtendienste in Deutschland e.V.*, „Vom Wissen zum Handeln: Integrierte Lagekompetenz für integrierte Entscheidungsprozesse: Stellungnahme des GKND zum Nationalen Sicherheitsrat“, 21. September 2021, [https://securityconference.org/assets/02\\_Dokumente/01\\_Publikationen/2021/210921\\_GKND\\_Stellungnahme\\_Lagekompetenz\\_Sicherheitsrat.pdf](https://securityconference.org/assets/02_Dokumente/01_Publikationen/2021/210921_GKND_Stellungnahme_Lagekompetenz_Sicherheitsrat.pdf).
  - 2 Bereits 1998 hatte die rot-grüne Koalition in ihrem Koalitionsvertrag die Aufwertung des Bundessicherheitsrats beschlossen, siehe Sarah Brockmeier/Tobias Bunde, „Kommt Zeit, kommt Rat?“, IPG vom 11. Oktober 2021, <https://www.ipg-journal.de/rubriken/aussen-und-sicherheitspolitik/artikel/kommt-zeit-kommt-rat-5482/>.
  - 3 Julia Klaus, „Nach Afghanistan-Debakel: Brauchen wir einen nationalen Sicherheitsrat?“, ZDF vom 25. August 2021, <https://www.zdf.de/nachrichten/politik/afghanistan-nationaler-sicherheitsrat-100.html>; Christopher Heusgen/Wolfgang Ischinger, „Außen- und Entwicklungspolitik aus einem Guss“, FAZ vom 6. Oktober 2021, <https://zeitung.faz.net/faz/politik/2021-10-06/32c32a5fa42caf719d7287f87aaf0225/?GEPC=s3>.
  - 4 Clausewitz-Gesellschaft e.V., „Nationaler Sicherheitsrat – Stand der politischen Diskussion“, Stand: 19. Juni 2022, <https://www.clausewitz-gesellschaft.de/nationaler-sicherheitsrat-stand-der-politischen-diskussion-rk-west-am-18-10-2021/>.
  - 5 Clausewitz-Gesellschaft e.V., „Nationaler Sicherheitsrat – Stand der politischen Diskussion“, tand: 19. Juni 2022, <https://www.clausewitz-gesellschaft.de/nationaler-sicherheitsrat-stand-der-politischen-diskussion-rk-west-am-18-10-2021/>.
  - 6 Jan Hildebrand/Thomas Siegmund/Frank Specht, „Frühwarnsystem für Krieg und Krisen: FDP will einen Nationalen Sicherheitsrat einrichten“, Handelsblatt vom 5. Mai 2022, <https://www.handelsblatt.com/politik/deutschland/geplanter-beschluss-fruehwarnsystem-fuer-krieg-und-krisen-fdp-will-einen-nationalen-sicherheitsrat-einrichten/28308968.html>.

- in diversen Formaten zu Einzelthemen auf Ebene der Staatssekretäre.<sup>7</sup>

Der 1955 geschaffene **Bundessicherheitsrat**, ein Ausschuss des Bundeskabinetts, der sich zunächst noch auf Sicherheits- und Verteidigungspolitik im Sinne der zivil-militärischen „Gesamtverteidigung“ konzentrierte, wird heute im Wesentlichen nur noch für die Genehmigung von Rüstungsexporten tätig.<sup>8</sup>

## 2. Diskussion in Deutschland

In Deutschland werden **verschiedene Konzepte** zur Verbesserung der Koordination der Außen- und Sicherheitspolitik vorgeschlagen. Im Mittelpunkt steht zum einen die Forderung nach der **Schaffung eines Nationalen Sicherheitsrats** als neues Gremium, zum anderen die Forderung nach der **Ausweitung des Bundessicherheitsrats**.

Die Vorschläge für einen Nationalen Sicherheitsrat sehen übereinstimmend vor, dass dieser als ständiges ressortübergreifendes Gremium mit angeschlossenem Sekretariat und einem Lage- und Analysezentrum eingerichtet werden soll. Der Nationale Sicherheitsrat soll basierend auf einer ressortübergreifend abgestimmten Gesamtstrategie mit den Zielen und Prioritäten der deutschen Außen-, Sicherheits- und Entwicklungspolitik frühzeitig Krisen und Risiken erkennen können und strategische Handlungsempfehlungen zu diesen entwickeln.<sup>9</sup> **Unterschiedliche Vorstellungen** bestehen insbesondere hinsichtlich der Kompetenzen des Nationalen Sicherheitsrats, wobei die vorgeschlagenen Konzepte in dieser Hinsicht insgesamt noch **wenig ausgereift** sind.

- Sarah Brockmeier/Tobias Bunde, „Kommt Zeit, kommt Rat?“, IPG vom 11. Oktober 2021, <https://www.ipg-journal.de/rubriken/aussen-und-sicherheitspolitik/artikel/kommt-zeit-kommt-rat-5482/>.

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7 Tobias Bunde/Christoph Erber/Juliane Kabus, „Entscheidungsprozesse: Berliner Disharmoniker“, in: Tobias Bunde et al. (Hrsg.), „Zeitenwende | Wendezeiten“, Oktober 2020, <https://securityconference.org/publikationen/msr-special-editions/germany-2020/>, S. 145 (152-153). Ergänzt werden diese Formate zur Koordinierung um ressortübergreifende „TaskForce“-Formate, die sich auf einzelne Länder oder Regionen konzentrieren und typischerweise auf Ebene der Unterabteilungsleiter tagen, siehe ebd.

8 Tobias Bunde/Christoph Erber/Juliane Kabus, „Entscheidungsprozess: Berliner Disharmoniker“, in: Tobias Bunde et al. (Hrsg.), „Zeitenwende | Wendezeiten“, Oktober 2020, <https://securityconference.org/publikationen/msr-special-editions/germany-2020/>, S. 145 (152). Ständige Mitglieder des Bundessicherheitsrats sind der Bundeskanzler, der die Sitzungen leitet, der Chef des Bundeskanzleramts, der Außenminister, der Finanzminister, der Innenminister, der Justizminister, der Verteidigungsminister, der Wirtschaftsminister und der Minister für wirtschaftliche Zusammenarbeit und Entwicklung, siehe *Bundeszentrale für politische Bildung*, Bundessicherheitsrat (BSR), <https://www.bpb.de/kurz-knapp/lexika/politiklexikon/296278/bundessicherheitsrat-bsr/>.

9 Markus Keim, „Auf dem Holzweg Die deutsche Außenpolitik leidet zwar unter vielen Defiziten. Die Einrichtung eines Nationalen Sicherheitsrats würde jedoch keine Abhilfe schaffen“, IPG vom 1. Oktober 2022, <https://www.ipg-journal.de/rubriken/aussen-und-sicherheitspolitik/artikel/auf-dem-holzweg-5462/>; Julia Klaus, „Nach Afghanistan-Debakel: Brauchen wir einen nationalen Sicherheitsrat?“, ZDF v. 25. August 2021, <https://www.zdf.de/nachrichten/politik/afghanistan-nationaler-sicherheitsrat-100.html>.

- *Tobias Bunde/Christoph Erber/Juliane Kabus*, „Entscheidungsprozesse: Berliner Disharmoniker“, in: *Tobias Bunde et al.* (Hrsg.), „Zeitenwende | Wendezeiten“, <https://security-conference.org/publikationen/msr-special-editions/germany-2020/>, S. 145-164.
- *Christina Moritz*, „Nächster Halt: Nationaler Sicherheitsrat“, *Europäische Sicherheit & Technik*, Juni 2021, S. 16-18.
- *Christina Moritz*, „Nationaler Sicherheitsrat geht vor: Europäische Lösungen sind erst der nächste Schritt“, *Sicherheit & Technik*, September 2019, S. 33-37.
- *Julianne Smith*, „Eine Frage der Staatskunst: Deutschland sollte erneut über einen Nationalen Sicherheitsrat nachdenken“, *Internationale Politik: das Magazin für globales Denken* 74/1 (2019), [https://internationalepolitik.de/system/files/article\\_pdfs/ip\\_01-2019\\_smith\\_0.pdf](https://internationalepolitik.de/system/files/article_pdfs/ip_01-2019_smith_0.pdf), S. 92-98.

Die Forderungen nach einer Ausweitung und Aufwertung des Bundessicherheitsrats beinhalten übereinstimmend, dass dieser durch regelmäßige Treffen **institutionell verstetigt**, seine **Kompetenzen erweitert** und er **durch ein Sekretariat unterstützt** werden soll. Er soll fortwährend entsprechend den neuen Herausforderungen formal und inhaltlich angepasst werden können.

- *Tobias Bunde/Christoph Erber/Juliane Kabus*, „Entscheidungsprozesse: Berliner Disharmoniker“, in: *Tobias Bunde et al.* (Hrsg.), „Zeitenwende | Wendezeiten“, <https://security-conference.org/publikationen/msr-special-editions/germany-2020/>, S. 145-164.
- *Fachkommission Fluchtursachen*, „Krisen vorbeugen, Perspektiven schaffen, Menschen schützen: Bericht der Fachkommission Fluchtursachen der Bundesregierung“, 2021, <https://www.fachkommission-fluchtursachen.de/start>, S. 73-74.
- *Christina Moritz*, „Die Zeit ist reif für einen Nationalen Sicherheitsrat“, *Europäische Sicherheit & Technik*, Juni 2016, S. 86-88.

Andere Vorschläge, zum Beispiel die Etablierung **informeller Formate** wie nachrichtendienstliche Lagebesprechungen, eine kleine Präsidentenlage<sup>10</sup> oder eine Staatssekretärs- oder Staatsministerstelle im Kanzleramt,<sup>11</sup> stehen weniger im Mittelpunkt der Diskussion.

Für die Schaffung eines Nationalen Sicherheitsrats bzw. die Aufwertung des bestehenden Bundessicherheitsrats wird insbesondere vorgebracht, dass ein solches Gremium die **Handlungsfähigkeit der Bundesregierung steigern** würde. Die Aufstellung der Bundesregierung in der Außen- und Sicherheitspolitik habe sich seit den 1960er Jahren kaum weiterentwickelt. Heute würde Außenpolitik fast überall in der Regierung gemacht, in fast allen Ministerien gäbe es Fachressorts mit internationalem Bezug. Jedoch gebe es zurzeit im deutschen System keinen Ort für eine gemeinsame Strategiebildung. Alle bisherigen Mechanismen seien weitestgehend gescheitert. **Neue Herausforderungen** würden daher nur verkürzte Reaktionszeiten zulassen und eine Anpassung

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10 *Christina Moritz*, Nationaler Sicherheitsrat geht vor: Europäische Lösungen sind erst der nächste Schritt, *Sicherheit & Technik*, September 2019, S. 33-37.

11 *Tobias Bunde/Christoph Erber/Juliane Kabus*, Berliner Disharmoniker, in: *Tobias Bunde et al.* (Hrsg.), *Zeitenwende | Wendezeiten*, [https://securityconference.org/assets/01\\_Bilder\\_Inhalte/03\\_Medien/02\\_Publikationen/MS\\_C\\_Germany\\_Report\\_10-2020\\_De.pdf](https://securityconference.org/assets/01_Bilder_Inhalte/03_Medien/02_Publikationen/MS_C_Germany_Report_10-2020_De.pdf), S. 145-164

der Strukturen der Koordinierung im Bereich Außen- und Sicherheitspolitik erforderlich machen. Ein Nationaler Sicherheitsrat bzw. ein aufgewerteter Bundessicherheitsrat würde die **deutsche Außenpolitik weitsichtiger, kohärenter, effizienter und effektiver** machen.

- *Tobias Bunde/Christoph Erber/Juliane Kabus*, „Entscheidungsprozesse: Berliner Disharmoniker“, in: *Tobias Bunde et al.* (Hrsg.), „Zeitenwende | Wendezeiten“, <https://security-conference.org/publikationen/msr-special-editions/germany-2020/>, S. 145-164.
- *Sarah Brockmeier/Tobias Bunde*, „Kommt Zeit, kommt Rat?“, IPG vom 11. Oktober 2021, <https://www.ipg-journal.de/rubriken/aussen-und-sicherheitspolitik/artikel/kommt-zeit-kommt-rat-5482/>.
- *Christina Moritz*, „Nächster Halt: Nationaler Sicherheitsrat“, Europäische Sicherheit & Technik, Juni 2021, S. 16-18.
- *Christina Moritz*, „Von Krabben und Nationalen Sicherheitsräten: Wir wissen alles, oder?“, Sicherheit & Technik, Januar 2020, S. 27-28.
- *Christina Moritz*, „Nationaler Sicherheitsrat geht vor: Europäische Lösungen sind erst der nächste Schritt“, Sicherheit & Technik, September 2019, S. 33-37.
- *Nils Schmid/Jürgen Hardt*, „Nationaler Sicherheitsrat überfällig?“, Loyal: Das Magazin für Sicherheitspolitik 1 (2022), S. 7.

Der Diskussion über die Schaffung eines Nationalen Sicherheitsrats bzw. die Aufwertung des Bundessicherheitsrats wird entgegengehalten, dass es erst einer **umfassenden nationalen Sicherheitsstrategie** bedürfe, um abschätzen zu können, ob es ausreiche, bestehende Strukturen zu optimieren oder ob tatsächlich neue Strukturen notwendig seien.

Gegen die Schaffung eines Nationalen Sicherheitsrats wird eingewandt, dass dessen Wirksamkeit vom Regierungssystem abhängt. Der Nationale Sicherheitsrat sei **ein Instrument aus dem Präsidialsystem** und sei **für Deutschland mit seinen Koalitionsregierungen ungeeignet**. Vorschläge für einen deutschen Nationalen Sicherheitsrat verkennten die **außenpolitische Rolle des Bundestages** und suggerierten strategische Geschlossenheit, wo es keine geben könne. Einer weitreichenden Entscheidungsgewalt des Nationalen Sicherheitsrats stehe die **Kontrolle durch den Bundestag** entgegen, etwa bei Mandatierungen von Auslandseinsätzen der Bundeswehr oder der Bewilligung von Finanzmitteln für das außen- und sicherheitspolitische Handeln der Bundesregierung. Es gäbe zudem **keinen empirischen Beleg** für die erhoffte Wirkung des Nationalen Sicherheitsrats. Ein Konzeptionsproblem würde mit einem Koordinationsproblem verwechselt.

- *Markus Keim*, „Auf dem Holzweg Die deutsche Außenpolitik leidet zwar unter vielen Defiziten. Die Einrichtung eines Nationalen Sicherheitsrats würde jedoch keine Abhilfe schaffen“, IPG vom 1. Oktober 2022, <https://www.ipg-journal.de/rubriken/aussen-und-sicherheitspolitik/artikel/auf-dem-holzweg-5462/>:
- Interview mit dem sicherheitspolitischen Experten und Publizisten Walther Stützel im *Deutschlandfunk* vom 5. Mai 2008, „Nationaler Sicherheitsrat passt nicht zu Koalitionsregierungen“, <https://www.deutschlandfunk.de/stuetzle-nationaler-sicherheitsrat-passt-nicht-zu-100.html>.
- *Nils Schmid/Jürgen Hardt*, „Nationaler Sicherheitsrat überfällig?“, Loyal: Das Magazin für Sicherheitspolitik 1 (2022), S. 7.

- *Julianne Smith*, „Eine Frage der Staatskunst: Deutschland sollte erneut über einen Nationalen Sicherheitsrat nachdenken“, *Internationale Politik: das Magazin für globales Denken* 74/1 (2019), [https://internationalepolitik.de/system/files/article\\_pdfs/ip\\_01-2019\\_smith\\_0.pdf](https://internationalepolitik.de/system/files/article_pdfs/ip_01-2019_smith_0.pdf), S. 92-98.

In der Literatur finden sich zudem zahlreiche Vergleiche eines potentiellen deutschen Nationalen Sicherheitsrats mit Nationalen Sicherheitsräten anderer Länder, insbesondere Großbritannien, Frankreich, USA und Japan.

- *Tobias Bunde/Christoph Erber/Juliane Kabus*, „Entscheidungsprozesse: Berliner Disharmoniker“, in: *Tobias Bunde et al.* (Hrsg.), „Zeitenwende | Wendezeiten“, <https://security-conference.org/publikationen/msr-special-editions/germany-2020/>, S. 145-164.
- *Gesprächskreis Nachrichtendienste in Deutschland e.V.*, „Vom Wissen zum Handeln: Integrierte Lagekompetenz für integrierte Entscheidungsprozesse: Stellungnahme des GKND zum Nationalen Sicherheitsrat“, 21. September 2021, [https://securityconference.org/assets/02\\_Dokumente/01\\_Publikationen/2021/210921\\_GKND\\_Stellungnahme\\_Lagekompetenz\\_Sicherheitsrat.pdf](https://securityconference.org/assets/02_Dokumente/01_Publikationen/2021/210921_GKND_Stellungnahme_Lagekompetenz_Sicherheitsrat.pdf).
- *Christina Moritz*, „Nationaler Sicherheitsrat geht vor: Europäische Lösungen sind erst der nächste Schritt“, *Sicherheit & Technik*, September 2019, S. 33-37.
- *Julianne Smith*, „Eine Frage der Staatskunst: Deutschland sollte erneut über einen Nationalen Sicherheitsrat nachdenken“, *Internationale Politik: das Magazin für globales Denken* 74/1 (2019), [https://internationalepolitik.de/system/files/article\\_pdfs/ip\\_01-2019\\_smith\\_0.pdf](https://internationalepolitik.de/system/files/article_pdfs/ip_01-2019_smith_0.pdf), S. 92-98.

### 3. Ausgewählte Staaten mit Nationalem Sicherheitsrat

#### 3.1. Belgien

The National Security Council created by Royal Decree exists since 28 January 2015.

The National Security Council shall promote coordination, cooperation and the flow of information between the intelligence and security services and the government. Furthermore, it determines Belgium's intelligence and security policy. Primarily, the Council shall provide a more effective response in the combat against rising terrorism and extremism.

The National Security Council was created based on Article 37 of the Belgian Constitution, which stipulates that “[t]he federal executive power, as regulated by the Constitution, belongs to the King” (*i.e.* the federal Government).<sup>12</sup>

According to Article 2 of the Royal Decree of 22 December 2020, the National Security Council is composed of:

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12 De Kamer, *The Belgian Constitution* (English translation), März 2021, [https://www.dekamer.be/kvvcr/pdf\\_sections/publications/constitution/GrondwetUK.pdf](https://www.dekamer.be/kvvcr/pdf_sections/publications/constitution/GrondwetUK.pdf).



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- the Prime Minister, who chairs the National Security Council;
  - the Ministers responsible for Justice, Defense, the Interior and Foreign Affairs;
  - the Deputy Prime Ministers (insofar as they are not already part of the Council by virtue of their responsibilities for Justice, Defense, the Interior or Foreign Affairs);
  - the chairman of the Coordination Committee for Intelligence and Security (in an advisory capacity, unless the chairman of the National Security Council decides otherwise).<sup>13</sup>

Additionally, members of the government may take part if the dossier concerns them, as well as members of the Coordination Committee whenever their expertise is required for a certain item on the agenda or when they need to exam a dossier that concerns them. Furthermore, any person who can aid the Council in its tasks as an advisor, may take part. Finally, since Belgium is a federal state, the Prime Ministers of the Regional and Community Governments can also be invited by the federal Prime Minister to participate in the Council's meetings for the examination of dossiers that particularly concern them.<sup>14</sup>

The National Security Council has a secretariat. According to Article 5 of Royal Decree of 22 December 2020, the secretariat of the National Security Council is overseen by a representative of the Prime Minister and is supported by the Chancellery ('Ministry') of the Prime Minister. The Secretariat is in charge of all formal aspects of the Council's operation and prepares the notifications of the Council's meetings.<sup>15</sup>

According to Article 4 of Royal Decree of 22 December 2020, the National Security Council meets whenever the Prime Minister, i.e. its chairman, deems it necessary. The National Security Council does not only meet in times of emergency.<sup>16</sup>

According to Article 3 of the Royal Decree of 22 December 2020, the National Security Council has the following tasks and responsibilities:

- definition, follow-up, coordination and evaluation of the general intelligence and security policy;
- definition, follow-up, coordination and evaluation of the national security strategy;
- definition of priorities of the intelligence and security services;
- coordination of the national security priorities of the security services represented on the Coordination Committee;
- definition of the general policy on the protection of sensitive information;
- policy coordination in the fight against terrorism, extremism, proliferation of weapons of mass destruction and financing of these phenomena;

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13 Königlicher Erlass zur Schaffung des Nationalen Sicherheitsrates, des Strategischen Ausschusses für Nachrichten und Sicherheit und des Koordinierungsausschusses für Nachrichten und Sicherheit, [https://www.ejustice.just.fgov.be/mopdf/2021/04/19\\_1.pdf#Page10](https://www.ejustice.just.fgov.be/mopdf/2021/04/19_1.pdf#Page10).

14 Ebd.

15 Ebd.

16 Ebd.

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- monitoring the coordinated implementation of its decisions.<sup>17</sup>

The National Security Council can discuss the deployment of armed forces abroad, but only the King, *i.e.* the (entire) federal Government, is competent to make the actual decision of a possible deployment.

The National Security Council is not competent to deal with arms exports, since the latter is a responsibility of the Regions, with the exception of arms exports related to the army or the police. So any Council decision in this field, apart from decisions on arms exports related to the army (or to the police), will have to be taken in coordination with the Regional Governments. The Prime Ministers of the Regional Governments can be invited by the federal Prime Minister to participate in the Council's meetings for the examination of dossiers that particularly concern them.

As can be concluded from the above-mentioned tasks of the National Security Council, it is both a policy-making or decision-making body and a coordinating body. The National Security Council's recommendations and decisions are followed in practice. They are subject to classic parliamentary scrutiny.

There is no obligation to make the National Security Council's decisions public. According to Article 5 of Royal Decree of 22 December 2020, its decisions may be classified from top secret to confidential if they include classified or confidential information.<sup>18</sup> The National Security Council's decisions may be made public if they do not include classified or confidential information and if they are in the general interest of society.

The Strategic Intelligence and Security Committee and the Coordination Committee for Intelligence were added by Royal Decree on 22 December 2020 to improve the functioning of the National Security Council and support it in its work.<sup>19</sup>

The Strategic Intelligence and Security Committee is composed of representatives of members of the National Security Council and is chaired by a representative of the Prime Minister. According to Article 8 of Royal Decree of 22 December 2020, the Strategic Committee discusses the proposals of the Coordination Committee and prepares meetings of the National Security Council and it ensures the coordinated implementation of the Council's decisions. The chairman of the Coordination Committee can take part as an advisor in the meetings of the Strategic Committee as long as the chairman of the Strategic Committee does not disapprove.<sup>20</sup>

According to Article 13 of Royal Decree of 22 December 2020, the Coordination Committee promotes the proper and efficient coordination, cooperation and exchange of information between

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17 Ebd.

18 Ebd.

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the security services represented in the Coordination Committee, formulates and prepares proposals to the Council that fall within the scope of the Council's tasks, and coordinates the execution of the decisions of the Council.<sup>21</sup>

According to Article 12 of Royal Decree of 22 December 2020, the permanent members of the Coordination Committee for Intelligence and Security or simply "the Coordination Committee" are:

- the Administrator General of the Security of the State (VSSE), being the civil intelligence and security service;
- the Head of the General Intelligence and Security Service of the Belgian army (ADIV - SGRS);
- the Commissioner-General of the Federal Police; the Director of the Coordination Unit for Threat Analysis (CUTA);
- the Director-General of the National Crisis Centre;
- the chairman of the Management Committee of the Ministry of Foreign Affairs;
- a representative of the College of Prosecutors General;
- the Federal Public Prosecutor;
- the chief of defense;
- the Director of the Centre for Cybersecurity Belgium.<sup>22</sup>

Non-permanent members can also be invited to participate in the meetings of the Coordination Committee. These include for example the Director-General of the General Directorate for Air Transport and Maritime Transport of the Ministry of Mobility and Transport, and the chairman of the Financial Intelligence Processing Unit, as well as any other government department if relevant dossiers are under consideration.<sup>23</sup>

In the event of a change of government, the composition of the Coordination Committee remains unchanged. The presence of a number of permanent members, such as the Administrator General of the Security of the State (VSSE) and the Head of the General Intelligence and Security Service of the Belgian army (ADIV - SGRS), can contribute to the continuity of the National Security Council in questions of foreign policy. In fact, one of the Coordination Committee's tasks is to formulate proposals to the National Security Council that fall within the scope of the Council's tasks. Furthermore, the chairman of the Coordination Committee takes part in the Council's meetings in an advisory capacity, unless the chairman of the Council decides otherwise. On these occasions, he may be assisted by other (permanent or non-permanent) members of the Coordination Committee when their expertise is necessary for the discussion of certain items on the agenda.

Weiterführende Links und Literatur:

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21 Ebd.

22 Ebd.

23 Ebd.

- FPS Chancellery of the Prime Minister, Directorate-General for Secretariats and Coordination, <https://kanselarij.belgium.be/en/organisation/directorate-general-secretariats-and-coordination>.

### 3.2. Dänemark

The Danish Government's Security Committee was founded in the early 1950s. The function of the Committee is to exchange information about the most important matters with regard to national security. Information to the Security Committee can be presented in written or verbal form. The committee meets when it is deemed necessary, and the work of the committee is strictly confidential.

The Security Committee is not competent to make legally binding decisions. It is up to the relevant ministers to take action with regard to what has been discussed within the committee.

The Security Committee is chaired by the Prime Minister, and consists of the Minister for Finance, the Minister for Foreign Affairs, the Minister of Justice and the Minister of Defence.

In reaction to the tsunami in Thailand and an explosion at a fire-works factory in Denmark, an additional crisis management system was created in 2005. The crisis management system has not been established by law, but is rather part of the National Emergency Plan with its procedures detailed in separate plans. The management is done by the National Operational Staff and is based on the principle of the Emergency Response Act, meaning that the police coordinates the authorities overall effort. Other rules of procedure are agreed between the authorities or determined by the ministries.

Within the crisis management system every authority on all levels (central government, regional, and local) has to familiarize and prepare itself for its respective roles and responsibilities. The cross-sectorial coordination can take place on five levels: the Government Security Committee, the Senior Officials' Security Committee, the National Operational Staff, the 12 local operational staffs, and the local incident command in the response area.

The National Operational Staff is chaired by the Danish National Police with the intelligence services as permanent members. Other authorities can be involved as members if need be. The National Operational Staff is not an authority but a forum for coordination, and therefore not affected by a change of government. Its secretariat is staffed 24/7 and monitors events and developments. The National Operational Staff will be activated when there is a need for coordination or exchange of information. It must, among other tasks, ensure that the government's crisis management organization and the relevant sectors and authorities continuously possess relevant, coordinated, and precise information concerning the specific response (e.g. situation reports) necessary for decision-making.

The National Operational Staff does not deal with arms exports. It will have a coordination role in the Host Nation Support in case of larger NATO deployments of the armed forces in Denmark.

Each individual authority involved has and maintains full responsibility for managing the response within its own sector. Likewise, each individual authority is responsible for informing its own organization and relevant actors, as well as for communicating to the public. The National Operational Staff secures cross-sectorial coordination and mutual orientation.

The Central Operational Communication Staff (DCOK) is a staff under the National Operational Staff. DCOK is responsible for ensuring the quick distribution of relevant, accurate, correct, and coordinated information to the public and to the media concerning the situation and possible precautionary measures. DCOK participants must mirror the composition of the National Operational Staff.

Weiterführende Links und Literatur:

- *Sune J. Andersen/Martin Ejnar Hansen/Philip H. J. Davies*, “Oversight and governance of the Danish intelligence community”, *Intelligence and National Security* 37 (2022), <https://doi.org/10.1080/02684527.2021.1976919>, S. 241-261.
- *Rønn Shakoor/Daniel Tallat*, “The Intelligence Cycle in Denmark, Unwinding and reconceptualising the Process of formulating Intelligence: Requirements surrounding the Middle East in the Danish Defence Intelligence Service”, Odense 2021, <https://doi.org/10.21996/pv0w-9j13>.

### 3.3. Frankreich

France has a National Defense and Security Council (CDSN) created by decree of 24 December 2009. This decree has been codified in articles R.1122-1 to R.1122-10 of the Defense Code.<sup>24</sup> Its structural origins can be traced back to the Superior Council of National Defense, which was created in 1906. Depending on the constitutional framework and political practice, this security structure was either attached to the President of the Republic or to the Prime Minister. It dealt either only with international and defense issues, or also with internal security issues.<sup>25</sup>

The CDSN defines the guidelines for the military programme, deterrence, conduct of external operations, the planning of responses to major crises, intelligence, economic and energy security, as well as for the internal security programme contributing to national security and the fight against terrorism.<sup>26</sup> The CDSN is chaired by the President of the Republic and is further comprised of the Prime Minister, the Minister of Defence, the Minister of the Interior, the Minister responsible for

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24 Code de la défense, Art. R.1122-1 – R.1122-10, <https://www.legifrance.gouv.fr/codes/id/LE-GISCTA000021544354/2010-01-13>.

25 Élysée, Defence and National Security Council, <https://www.elysee.fr/en/french-presidency/defence-and-national-security-council>.

26 Code de la défense, Art. R.1122-1, <https://www.legifrance.gouv.fr/codes/id/LEGISCTA000021544354/2010-01-13>.

the Economy, the Minister responsible for the Budget, the Minister of Foreign Affairs, and if necessary other ministers for matters falling within their responsibility.<sup>27</sup>

The secretariat of the CDSN is staffed by the Secretary General for National Defence and Security<sup>28, 29</sup>. The secretariat of the CDSN (SGDSN) is part of the department of the Prime Minister. In accordance with the directives of the President of the Republic and the Prime Minister, the SGDSN prepares in liaison with the relevant ministerial departments the meetings of the CDSN. It provides statements of decisions taken and monitors their execution. The SGDSN assists the Prime Minister in the exercise of his responsibilities in matters of Defence and National Security. In this capacity, the SGDSN:

- leads and coordinates inter-ministerial work related to National Defence and security policy and attributed public policies;
- monitors, in liaison with the corresponding ministerial departments, the evolution of international crises and conflicts that may affect France's Defence and National Security interests, and studies the measures that may be taken. It prepares and conducts international negotiations or meetings concerning National Defence and Security and monitors their results;
- proposes, disseminates, enforces and monitors the measures necessary to protect the secrecy of national defence. It prepares inter-ministerial regulations in matters of Defence and National Security, ensures their dissemination and monitors their application;
- in support of the national intelligence coordinator, it contributes to the adaptation of the legal framework in which the intelligence services operate and to the planning of their resources, and ensures the organization of inter-ministerial intelligence analysis and synthesis groups;
- draws up inter-ministerial planning for National Defence and Security, ensures its application and conducts inter-ministerial exercises to implement it. It coordinates the preparation and implementation of National Defence and Security measures incumbent on the various ministerial departments and ensures the coordination of civil and military resources in the event of a major crisis;
- ensures that the President of the Republic and the Government have the necessary command and electronic communication resources for National Defence and Security and ensures their operation;
- proposes to the Prime Minister and implements the Government's policy on the security of information systems. To this end, it has at its disposal a national service called the "Agence nationale de la sécurité des systèmes d'information";

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27 Code de la défense, Art. R.1122-2, <https://www.legifrance.gouv.fr/codes/id/LEGISCTA000021544354/2010-01-13>.

28 Secrétariat du Conseil de Défense et de Sécurité Nationale (SGDSN), <http://www.sgdsn.gouv.fr/missions/assurer-le-secretariat-du-conseil-de-defense-et-de-securite-nationale/>.

29 Code de la défense, Art. R.1122-5, <https://www.legifrance.gouv.fr/codes/id/LEGISCTA000021544354/2010-01-13>.

- ensures the coherence of actions undertaken in the field of scientific research policy and technological projects of interest to Defence and National Security, and contributes to the protection of strategic national interests in this field.<sup>30</sup>

The administrative continuity of the CSDN is assured by the SGDSN. However, there may be breaks in diplomacy and defence policy depending on changes in the political majority in Parliament. The meetings of the National Defence and Security Council are at the discretion of the President of the Republic. Their frequency varies according to the circumstances and the subjects to be dealt with (e.g. terrorist attacks).

Questions relating to intelligence are dealt with in a specialized formation of the CDSN, the National Intelligence Council.<sup>31</sup> The National Intelligence Council defines the strategy and priorities in the field of intelligence. It plans the human and technical resources of the specialized intelligence services. The National Intelligence Council is chaired by the President of the Republic, and further consists of the Prime Minister, the ministers and the directors of the specialized intelligence services, whose presence is deemed necessary, as well as the National Intelligence Coordinator.

The National Intelligence Coordinator advises the President of the Republic in the field of intelligence. With the assistance of the SGDSN, the National Intelligence Coordinator reports to the National Intelligence Council, preparing its meetings and ensuring the implementation of the decisions taken. The National Intelligence Coordinator is the communicative bridge between the President of the Republic and the Prime Minister and the heads of these intelligence services. The National Intelligence Coordinator may be heard by the parliamentary delegation for intelligence.<sup>32</sup>

The Nuclear Armaments Council is another specialized body of the National Defence and Security Council. The Nuclear Armaments Council defines the strategy and ensures the progress of nuclear deterrence programs. The Nuclear Armaments Council is chaired by the President of the Republic, and further consists of the Prime Minister, the Minister of Defence, the Chief of Staff of the Armed Forces, the General Delegate for Armaments and the Director of Military Applications of the Atomic Energy Commission.<sup>33</sup>

Although the issue of arms sales can be raised at the CDSN meeting, it is the Prime Minister who is competent in this area. Export or transfer licences are examined by the inter-ministerial commission for the study of war material exports (CIEEMG). The CIEEMG, chaired by the Secretary

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30 Siehe <http://www.sgdsn.gouv.fr/>.

31 Code de la défense, Art. R.1122-6 – R.1122-7, <https://www.legifrance.gouv.fr/codes/id/LE-GISCTA000021544354/2010-01-13>.

32 Code de la défense, Art. R.1122-8, <https://www.legifrance.gouv.fr/codes/id/LEGISCTA000021544354/2010-01-13>.

33 Code de la défense, Art. R.1122-9 – R.1122-10, <https://www.legifrance.gouv.fr/codes/id/LE-GISCTA000021544354/2010-01-13>.

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General of Defence and National Security (SGDSN), is composed of representatives of the Minister of Defence, the Minister of Foreign Affairs and the Minister of the Economy.<sup>34</sup>

According to the Defence Code, the decisions of the CDSN are not legally binding. However, in practice they are due to the great importance of the President of the Republic in French institutions. No text provides for parliamentary control, even though there is a "parliamentary delegation for intelligence" in charge of monitoring intelligence issues.<sup>35</sup> The meetings of the CDSN are often the subject of press releases, notably on the website of the Presidency of the Republic.<sup>36</sup> But the documents of the CDSN are classified secret and are not communicable.

Weiterführende Links und Literatur:

- *Thibault Desmoulins*, „La formalisation du présidentielisme sous la Cinquième République: le Conseil de défense et de sécurité nationales”, in: *Jus politicum. Revue de droit politique*, (2021) 25, S. 221 – 254, <http://juspoliticum.com/article/La-formalisation-du-presidentielisme-sous-la-Cinquieme-Republique-le-Conseil-de-defense-et-de-securite-nationale-1375.html>.
- Élysée, Defence and National Security Council, <https://www.elysee.fr/en/french-presidency/defence-and-national-security-council>.

### 3.4. Israel

The Israeli National Security Council was established in 1999 based on Resolution No. 4889 by the Israeli government. In 2008, the National Security Council Law established the National Security Council as the central body supporting the Prime Minister and the government in issues of foreign affairs and security of the State of Israel.<sup>37</sup>

The head of the National Security Council is the National Security Adviser, who reports directly to the Prime Minister. The responsibilities of the National Security Council are set out in the National Security Council Law, and include, among others:

- coordinating the work of the government and other bodies in matters of foreign affairs and security and preparing deliberations of the government and its committees in these topics;
- monitoring the implementation of the decisions of the government and its committees and reporting their implementation to the Prime Minister;

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34 Siehe hierzu <http://www.sgdsn.gouv.fr/missions/controler-les-exportations-de-materiel-de-guerre/>.

35 Siehe hierzu <https://www2.assemblee-nationale.fr/15/les-delegations-comite-et-office-parlementaire/delegation-parlementaire-au-renseignement>.

36 Siehe hierzu <https://www.elysee.fr/la-presidence/le-conseil-de-defense-et-de-securite-nationale>.

37 Jewish Virtual Library, Israel Executive Branch: National Security Council, <https://www.jewishvirtuallibrary.org/israel-national-security-council>.



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- proposing to the Prime Minister agendas and topics for discussion of the Ministerial Committee for National Security Affairs, and of any other ministerial body related to foreign affairs and security and recommendation of participants and the rank of those summoned to take part in these discussions;
  - preparing the assessment of the political-security situation and its submission to the Ministerial Committee for National Security Affairs;
  - preparing various other situation assessments regarding matters of foreign affairs and security, including opinions and analysis in the various intelligence fields, as needed and with the Prime Minister's approval;
  - preparing the discussions on the defense budget, as well as any other budgetary sections that the Minister of Defense or the Minister of Foreign Affairs or the security bodies subordinate to the Prime Minister are in charge of, including formulating alternatives, according to priority orders reasoned with an overall vision.
  - activating the National Crisis Management Center in the Prime Minister's Office;
  - examining and suggesting updates of the security model of the State of Israel;
  - examining security projects of importance and presenting them to the government, the Ministerial Committee for National Security Affairs, or any other relevant body.<sup>38</sup>

### 3.5. Italien

The Italian National Committee for Law and Order (Comitato nazionale dell'ordine e della sicurezza pubblica; Cnosp) was established by Decree Law No. 626 in 1979 as part of a comprehensive reform of the public security system, in view of the resurgence of criminal manifestations carried out by Mafia and terrorist associations. The committee should promote coordination of public order and safety issues. The functional and organizational autonomy of the police forces was not affected. The Cnosp found confirmation in Law No. 121 in 1981, which outlined the new architecture of the Public Security Administration. It is governed by Articles 18 and 19 of this law.<sup>39</sup>

The Cnosp is an auxiliary advisory body to the Minister of the Interior in matters of public order and security. Its composition is determined by Article 18 of Law 121/81. It is chaired by the Minister of the Interior. Other members are an Undersecretary of State for the Interior, appointed by the Minister, who is vice chairman, the Chief of Police, the Commander General of the Carabinieri, the Commander General of the Guardia di Finanza, the Director General of the Prison Administration and the Director General of the State Forestry Corps.<sup>40</sup>

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38 Ebd.

39 Ministero Dell' Interno, Comitato nazionale dell'ordine e della sicurezza pubblica (Cnosp), <https://www.interno.gov.it/it/ministero/comitato-nazionale-dellordine-e-sicurezza-pubblica-cnosp>.

40 Legge 1 aprile 1981, n. 121 Nuovo ordinamento dell'Amministrazione della pubblica sicurezza, [https://presidenza.governo.it/USRI/ufficio\\_studi/normativa/Legge\\_121\\_1\\_Aprile\\_1981.pdf](https://presidenza.governo.it/USRI/ufficio_studi/normativa/Legge_121_1_Aprile_1981.pdf).

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The Minister of the Interior may invite the directors general of the Ministry of the Interior, the Inspector General of the Harbour Master Corps and other representatives of the state administration and the armed forces to attend meetings of the Cnosp; he may invite members of the judiciary to the meetings in consultation with the responsible state prosecutor.<sup>41</sup> A senior official performs the functions of the secretary of the Committee.<sup>42</sup>

The Committee shall meet in all cases provided for by law and on any matter of a general nature relating to public order and security, as well as in questions relating to the order and organization of police forces submitted to it by the Minister. Its advice is mandatory on:

- regulations of general measures concerning police forces;
- plans for the allocation of functional and territorial competencies to the police forces;
- financial planning relating to the police forces;
- the planning of logistical and administrative services of a common character for the police forces;
- planning for the deployment and coordination of police forces and their technical services;
- the general lines for the education, training and specialization of the police forces' personnel.<sup>43</sup>

The Committee shall be heard on the criteria for determining the armament provided to the Administration of Public Security and personnel in the roles of that Administration performing police functions.

In Italy the intelligence services are separate from the police. There are two national intelligence services: the AISE – Agenzia informazioni e sicurezza esterna (External Intelligence and Security Agency)<sup>44</sup> and the AISI – Agenzia informazioni e sicurezza interna (Internal Intelligence and Security Agency).<sup>45</sup> A third body, the DIS Dipartimento informazioni per la sicurezza (Security Intelligence Department) ensures the coordination between the AISE and the AISI. However, the heads of the intelligence services may attend meetings of the Cnosp to adopt joint policies on intersecting issues.

There is no specific regime of control of the Cnosp. The ordinary rules of parliamentary control of government organs apply. There also is no specific legal obligation to make the Cnosp's recommendations public. Minutes of committee meetings are not available on the Ministry of the Interior website.

Weiterführende Links:

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41 Ebd.

42 Ebd.

43 Ebd.

44 Sicurezzanazionale, AISE, <https://www.sicurezzanazionale.gov.it/sisr.nsf/chi-siamo/organizzazione/aise.html>.

45 Sicurezzanazionale, AISI, <https://www.sicurezzanazionale.gov.it/sisr.nsf/chi-siamo/organizzazione/aisi.html>.

- Ministero Dell' Interno, Comitato nazionale dell'ordine e della sicurezza pubblica (Cnosp), <https://www.interno.gov.it/it/ministero/comitato-nazionale-dellordine-e-sicurezza-pubblica-cnosp>

### 3.6. Kanada

The National Security Advisor to the Prime Minister was created on December 12, 2003, “to improve coordination and integration of security efforts among government departments”. In the Prime Minister’s introduction to Canada’s National Security Policy,<sup>46</sup> the following reasons are given for the creation of the National Security Advisor in the context of an “increasingly complex and dangerous threat environment”:

The horrific events of September 11, 2001, demonstrated how individuals could exploit such openness to commit acts of terrorism that attempt to undermine the core values of democratic societies. Those events were a stark reminder to Canadians of the tragic loss of 329 lives aboard Air India flight 182 in 1985.

The recent SARS outbreak and the 2003 electrical blackout showed how our interconnect- edness to events originating elsewhere can have a major impact on the health and economic well-being of Canadians. And we continue to face more longstanding threats, such as orga- nized crime and natural disasters. [...]

Working to prevent attacks like the one launched against commuter trains in Madrid re- quires a more integrated approach to national security — integrated inside the Government of Canada and with key partners. Such an approach will also help us to develop a long-term strategic framework to more effectively prevent and respond to other types of security threats. In short, we need to take the historic step of issuing Canada’s first-ever comprehen- sive statement of national security policy which provides an integrated strategy for address- ing current and future threats to our country.<sup>47</sup>

Canada’s National Security Advisor to the Prime Minister is an individual. In 2022, the Prime Minister announced changes in the senior ranks of the Public Service, among which was the ap- pointment of current Deputy Minister of National Defence as National Security and Intelligence Advisor to the Prime Minister (NSIA). Being part of the Privy Council Office (PCO), the NSIA is supported by several secretaries and one advisor to the Cabinet, as in the PCO Organization Chart.<sup>48</sup>

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46 Government of Canada, Securing an Open Society: Canada’s National Security Policy, April 2004, <https://publications.gc.ca/collections/Collection/CP22-77-2004E.pdf>, <https://orders-in-council.canada.ca/attachment.php?attach=5389&lang=en>.

47 Ebd.

48 Ebd.

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The NSIA has an Office within the PCO and has approximately 70 employees. The role is also supported by several secretaries and one advisor to the Cabinet as in the PCO Organization Chart, including the following:

- Deputy Secretary to the Cabinet, Emergency Preparedness and COVID Recovery
- Assistant Secretary to the Cabinet, Emergency Preparedness,
- Assistant Secretary to the Cabinet, COVID-19 Coordination,
- Assistant Secretary to the Cabinet, Intelligence Assessment,
- Assistant Secretary to the Cabinet, Security and Intelligence,
- Foreign and Defence Policy Advisor to the Prime Minister,
- Assistant Secretary to the Cabinet, Foreign and Defence Policy.

The NSIA “meet(s) with the Prime Minister, his office, and Ministers on a regular basis to help shape the Government’s national security agenda and respond to emerging issues”.<sup>49</sup> The NSIA has a coordinating role and the intelligence services have investigative and enforcement roles. The NSIA is an advisory body that:

- provides policy and operational advice as well as intelligence to the Prime Minister and Cabinet on issues related to national security;
- meets with the Prime Minister, his office, and Ministers on a regular basis to help shape the Government’s national security agenda and respond to emerging issues – everything from domestic terrorist incidents to international security crises;
- convenes and helps coordinate the security and intelligence community.

The NSIA is accountable to the Prime Minister, portfolio ministers, and Cabinet but is not subject to parliamentary control.<sup>50</sup> Furthermore, the NSIA’s recommendations/decisions are not made public.

Weiterführende Links und Literatur:

- Government of Canada, Publications, <https://publications.gc.ca/collections/Collection/CP22-77-2004E.pdf>.
- Government of Canada, Speech by the National Security and Intelligence Advisor to the Prime Minister to the Centre for International Governance Innovation: National Security Challenges in the 21st Century, 8. Juni 2021, <https://www.canada.ca/en/privy-council/services/national-security-intelligence-advisor-challenges.html>.

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49 Siehe hierzu Government of Canada, Speech by the National Security and Intelligence Advisor to the Prime Minister to the Centre for International Governance Innovation: National Security Challenges in the 21st Century, 8. Juni 2021, <https://www.canada.ca/en/privy-council/services/national-security-intelligence-advisor-challenges.html>.

50 Siehe hierzu Government of Canada, Raison d’être, mandate and role : who we are and what we do, <https://www.canada.ca/en/privy-council/corporate/mandate.html>.

### 3.7. Österreich

The National Security Council was created in 2001 in a phase characterised by many developments and changes in Austrian foreign and security policies. In the wake of the attacks of 9/11 politicians felt the need to streamline the various experts councils and political bodies. The National Security Council was established by the “Bundesgesetz über die Errichtung eines Nationalen Sicherheitsrates”.<sup>51</sup> The federal act regulates the composition and the convocation of the National Security Council, establishes a secretariat and stipulates rules on information security.

The National Security Council is chaired by the Federal Chancellor.<sup>52</sup> Other members are the Vice-Chancellor, the Minister for European and Foreign Affairs, the Defence Minister, the Interior Minister, the Minister of Justice, and delegates of all political parties that are represented in the Main Committee of the National Council. Each political party can nominate at least two members. Eight other party delegates will be nominated according to a proportional model based on d’Hondt. Members with a consultative vote are a civil servant of the Secretariat of the Federal President, a representative of the Chairperson of the (informal) Conference of the State Governors (“Landeshauptleutekonferenz”), the Secretary General of the Ministry of European and Foreign Affairs, the Chief of the General Staff of the Armed Forces, the Director General of Public Security, and one representative each of the Federal Chancellery, the Vice Chancellery, the Ministry of European and Foreign Affairs, and the Ministry of Defence.<sup>53</sup>

The National Security Council has a secretariat, which is an organisational unit of the Federal Chancellery.<sup>54</sup> The continuity of the National Security Council is ensured by its secretariat and members from the ranks of the ministries.

The Federal Chancellor has to convene the National Security Council. If two members so demand, a meeting must be convened within 14 days. There are at least two meetings per year.<sup>55</sup> Since 2018 the National Security Council has held at least 4 meetings per year. The majority of meetings is convened on the occasion of extraordinary events.

The National Security Council is an advisory body and has no command of police or intelligence services. Police and intelligence services may share their information with the members of the National Security Council. The National Security Council advises the Federal Government and its members in all fundamental matters of foreign, security and defence policy. It has to be consulted in all matters of great importance if a member so holds, in matters of foreign deployments according to Art.23f para 3 Federal Constitutional Law, in matters of Chapter VII of the UN

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51 Bundesgesetzblatt für die Republik Österreich, 16. November 2001, [https://www.ris.bka.gv.at/Dokumente/BgblPdf/2001\\_122\\_1/2001\\_122\\_1.pdf](https://www.ris.bka.gv.at/Dokumente/BgblPdf/2001_122_1/2001_122_1.pdf).

52 § 1 Bundesgesetz über die Errichtung eines Nationalen Sicherheitsrates, ebd.

53 § 3 Bundesgesetz über die Errichtung eines Nationalen Sicherheitsrates, ebd.

54 § 5 Bundesgesetz über die Errichtung eines Nationalen Sicherheitsrates, ebd.

55 § 4 Bundesgesetz über die Errichtung eines Nationalen Sicherheitsrates, ebd.

Charta, in fundamental matters of military defence, and when extraordinary matters regarding conscription will occur.<sup>56</sup>

In general, the recommendations and decisions will support the positions of the Federal Government and aim to secure all-party consensus. Most decisions and recommendations are therefore aligned with government projects.

There are no explicit rules on accountability. The National Security Council can be subject of parliamentary control through questions to the government members. Given the fact that the majority of members are parliamentarians or delegated by the political parties in parliament it is assumed that parliamentary control is guaranteed. If the National Security Council so decides, recommendations and decisions shall be made public.<sup>57</sup>

Weiterführende Links und Literatur:

- Bundeskanzleramt, Nationaler Sicherheitsrat, <https://www.bundeskanzleramt.gv.at/themen/sicherheitspolitik/nationaler-sicherheitsrat.html>
- Bundesgesetzblatt für die Republik Österreich, 16. November 2001, [https://www.ris.bka.gv.at/Dokumente/BgblPdf/2001\\_122\\_1/2001\\_122\\_1.pdf](https://www.ris.bka.gv.at/Dokumente/BgblPdf/2001_122_1/2001_122_1.pdf).

### 3.8. Polen

Pursuant to Article 135 of the Constitution of the Republic of Poland of 1997, the National Security Council is an “advisory body to the President of the Republic regarding internal and external security of the State”.<sup>58</sup> As it is an advisory body it is not entitled to take any decisions. The National Security Council has the right to consider and give its opinion on security assumptions, foreign policy, strategic problems of national security and projects of its strategy, defence doctrine, directions of development of the armed forces and non-military problems concerning the preparation of national security systems. The meetings of the National Security Council are convened by the President, at the same time determining their subject matter. The meetings are secret unless otherwise ordered by the President.<sup>59</sup>

According to the Order of the President of the Republic of Poland of 2 March 2016, the Council consists of: Speaker of the Sejm; Speaker of the Senate; President of the Council of Ministers; Minister of National Defence; Minister of Internal Affairs and Administration; Minister of Foreign

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56 § 2 Bundesgesetz über die Errichtung eines Nationalen Sicherheitsrates, ebd.

57 § 7 Bundesgesetz über die Errichtung eines Nationalen Sicherheitsrates, ebd.

58 The Constitution of the Republic of Poland of 2nd April, 1997. <https://www.sejm.gov.pl/prawo/konst/angielski/kon1.htm>.

59 Siehe auch National Security Bureau, The National Security Council, <https://en.bbn.gov.pl/en/president-of-poland/national-security-coun/about-the-national-sec/99.The-National-Security-Council.html>.

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Affairs; Coordinator of special services; Heads of political parties having a parliamentary club, or the heads of these clubs, or a person designated by the head of a parliamentary club from among MPs, senators or members of the European Parliament; Head of the Chancellery of the President of the Republic of Poland; the Head of the National Security Office. Meetings of the Council, at the invitation of the President of the Republic, may be attended by former Presidents of the Republic of Poland and former Prime Ministers; The President of the Republic of Poland may also invite other persons whose participation is advisable due to the subject of the meeting.<sup>60</sup>

The substantive and organisational background of the National Security Council is the National Security Office with the help of which the President of the Republic of Poland performs his tasks in the field of security and defence.

Weiterführende Links und Literatur:

- National Security Bureau, The National Security Council, <https://en.bbn.gov.pl/en/president-of-poland/national-security-coun/about-the-national-sec/99,The-National-Security-Council.html>.

### 3.9. Portugal

Portugal has had a Superior Council for National Defence since 1935.<sup>61</sup> After the transformation from dictatorship to democracy the Superior Council for National Defence was recreated by article 274 of the Portuguese constitution, with the following attributions:

1. The Superior Council for National Defence is chaired by the President of the Republic and shall be composed as laid down by law, to include members elected by the Assembly of the Republic.
2. The Supreme National Defence Council is the specific consultative organ for matters concerning national defence and the organisation, modus operandi and discipline of the Armed Forces, and may dispose of the administrative competences that are allocated to it by law.<sup>62</sup>

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60 Siehe auch ebd.

61 Presidency of the Portuguese Republic, Supreme Council for National Defence, <https://www.presidentia.pt/en/president-of-the-republic/duties-of-the-president/supreme-council-for-national-defence/>.

62 Assembleia da República, Constitution of the Portuguese Republic, seventh revision [2005], <https://www.parlamento.pt/sites/EN/Parliament/Documents/Constitution7th.pdf>.

The Superior Council for National Defence is governed by Organic Law No. 3/2021, which amends the National Defence Law.<sup>63</sup> The Council is chaired by the President of the Republic, who has a casting vote. Other members are: Prime Minister; Deputy Prime Minister and Ministers of State, if any; Minister of National Defence, Minister of Foreign Affairs, Minister of Internal Administration and Minister of Finance; Ministers responsible for the areas of industry, energy, transport and communications; Chief of the General Staff of the Armed Forces; Representatives of the Republic for the autonomous regions; Presidents of the governments of the Autonomous Regions of the Azores and Madeira; President of the National Defence Commission of the Assembly of the Republic; Chiefs of Staff of the Navy, Army and Air Force; Two Members of the Assembly of the Republic. The President of the Republic, on his own initiative or at the request of the Prime Minister, may invite any entities to participate in the meetings of the Superior Council for National Defence, without the right to vote.<sup>64</sup>

The composition of the Council is maintained until the new government takes office. The Superior Council for National Defence ordinarily meets every three months. There may also be extraordinary meetings, whenever called by the President of the Republic, on his own initiative or at the request of the Prime Minister.

The Superior Council for National Defence has a secretariat. The Superior Council is staffed by a general officer or other person of recognized merit, appointed and dismissed by the President of the Republic, after consultation with the Government. Support for the Superior Council for National Defence is provided by the General Secretariat of the Presidency of the Republic, in whose budget the funds necessary for its execution are entered.<sup>65</sup>

Regarding the distinction between the Superior Council for National Defence and the intelligence services (the Intelligence Services are divided in foreign and national departments), the Information System of the Portuguese Republic, a public body, which depends directly and hierarchically on the Prime Minister, is responsible for providing the information necessary for:

- prevention of threats to internal and external security;
- maintenance of the unity and integrity of the democratic rule of law;
- safeguarding independence and national interests.

The Superior Council for National Defence is a specific consultation body for matters relating to national defence and the organization, functioning and discipline of the Armed Forces. It is incumbent upon the Superior Council for National Defence, in the consultative scope, to issue an opinion on:

- the declaration of war and the making of peace;

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63 Diário da República electrónico, Lei Orgânica n.º 3/2021, 9. August 2021, <https://dre.pt/dre/detalhe/lei-organica/3-2021-169256654>.

64 Ebd.; Presidency of the Portuguese Republic, Supreme Council for National Defence, <https://www.presidentia.pt/en/president-of-the-republic/duties-of-the-president/supreme-council-for-national-defence/>.

65 Diário da República electrónico, Lei Orgânica n.º 3/2021, 9. August 2021, <https://dre.pt/dre/detalhe/lei-organica/3-2021-169256654>.



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- national defence policy;
  - the approval of international treaties in which the State assumes international responsibilities in the field of defence, namely the treaties for Portugal's participation in international security and defence organizations, as well as the peace, defence, border rectification treaties and the relating to military matters;
  - projects and proposals for legislative acts relating to national defence policy and the Armed Forces, the organization, functioning and discipline of the Armed Forces and the conditions of employment of the Armed Forces in a state of siege and in a state of emergency;
  - projects and proposals for military programming laws;
  - the draft strategic concept of national defence;
  - the participation of detachments of the Armed Forces, and of other forces when integrated into a military force, in military operations outside the national territory;
  - the organization of civil protection, assistance to populations and the safeguarding of public and private goods, in the event of war;
  - the fundamental defence infrastructures;
  - proposals relating to mobilization and requisition, necessary for the pursuit of the permanent objectives of the national defence policy;
  - other matters relating to national defence and the Armed Forces that are submitted to him by the President of the Republic, on his own initiative or at the request of the Prime Minister.<sup>66</sup>

Within its administrative scope the Superior Council for National Defence may confirm the military strategic concept and approve the specific missions of the Armed Forces, after a proposal by the Minister of National Defence; in time of war, exercise the powers provided for in article 43; approve proposals for the appointment and dismissal of commanders-in-chief.<sup>67</sup> Moreover, the Superior Council for National Defence deals with the participation of detachments of the Armed Forces, and of other forces when integrated into military operations outside the national territory.<sup>68</sup>

The Superior Council for National Defence is not subject to parliamentary control, it is only accountable to the President of the Republic. The President of the Republic may authorize publicity to be given to items on the agenda that have not been assigned a security classification. He may agree on the publication, after the meetings, of an information note, in which all or part of the object of the meeting and its results are succinctly indicated. Its opinions are not published, unless the Council itself determines to do so.

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66 Ebd.

67 Ebd.

68 Ebd.

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#### Weiterführende Links und Literatur:

- Presidency of the Portuguese Republic, Supreme Council for National Defence, <https://www.presidencia.pt/en/president-of-the-republic/duties-of-the-president/supreme-council-for-national-defence/>.

### 3.10. Spanien

The Spanish National Security Council was set up in 2013. It was created under the auspices of the National Security Strategy “Sharing a Common Project”<sup>69</sup> from the year 2013. In its chapter 5, the Strategy sees the need to build a

strong but flexible national institutional system that is able to adapt to change and security contingencies and capable of responding effectively, comprehensively and fully to the risks and threats of today’s world.<sup>70</sup>

The National Security Council’s action framework is provided by the following Acts:

- Law 36/2015, of 28 September, on National Security.<sup>71</sup>
- Last updating of the National Security Strategy “a Shared Project” (2021), approved by Royal Decree 1150/2021, of 28 December.<sup>72</sup>

The Council is composed of:

- the President of the Government (Prime Minister), who shall chair it;
- the Deputy Prime Ministers, if any;
- the Ministers of Foreign Affairs and Cooperation, Justice, Defence, Finance and Public Administrations, Interior, Transport, Industry, Energy and Tourism, Presidency, Economy and Competitiveness, Health, Social Services and Equality;
- the Director of the Office of the President of the Government, the Secretary of State for Foreign Affairs, the Chief of Defence Staff, the Secretary of State for Security and the Director of the National Intelligence Centre (with the rank of Secretary of State);

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69 Gobierno de Espana, Presidencia del Gobierno, The National Security Strategy: Sharing a Common Project, 2013, [https://www.lamoncloa.gob.es/documents/estrategiaseguridad\\_baja\\_julio.pdf](https://www.lamoncloa.gob.es/documents/estrategiaseguridad_baja_julio.pdf).

70 Ebd., S. 53.

71 Boletín Oficial Del Estado, Legislación Consolidada, Ley 36/2015, de 28 de septiembre, de Seguridad Nacional, <https://www.boe.es/buscar/pdf/2015/BOE-A-2015-10389-consolidado.pdf>.

72 Gobierno de Espana, Presidencia del Gobierno, National Security Strategy: A Shared Project, 2021, <https://www.dsn.gob.es/es/documento/estrategia-seguridad-nacional-2021>.

- the Director of the National Security Department shall be summoned to meetings of the National Security Council;
- the Heads of the other ministerial departments and Regional authorities affected by the decisions and actions to be taken by the Council may also sit on the Council, when convened in accordance with the matters to be dealt with;
- without prejudice to the provisions of sections 3 and 4, the heads of executive bodies of the General State Administration, of the public bodies, of the Self-Governed Communities and Ceuta and Melilla cities, as well as the authorities of the Local Administration, shall be summoned to the meetings of the Council when their contribution is considered necessary, and in any case when the matters to be dealt with affect their respective competences;
- those natural or legal persons whose contribution is considered relevant in view of the matters to be dealt with on the agenda may also be summoned.<sup>73</sup>

The National Security Department shall act as the technical secretariat and permanent working body of the National Security Council. Furthermore, the National Security Council has supporting bodies, which are known as “Specialised Committees”.<sup>74</sup> The Specialised Committees supporting the National Security Council are: Situation Committee; National Council on Cybersecurity; National Council on Maritime Security; Specialised Committee on Immigration; Specialised Committee on Energy Security; Specialised Committee on Non-Proliferation; Specialised Committee on Counter-Terrorism; National Council on Aerospace Security.<sup>75</sup>

The continuity of the National Security Policy is assured by the National Security Strategy. According to Section 4.3 of Law 36/2015,

the National Security Strategy is the strategic political framework of reference for the National Security Policy. It contains the analysis of the strategic environment, specifies the risks and threats that affect Spain's security, defines the strategic lines of action in each area and promotes the optimisation of existing resources.<sup>76</sup>

To this end, the National Security Strategy “will be reviewed every five years [therefore, regardless of electoral cycles] or whenever the changing circumstances of the strategic environment so

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73 Departamento de Seguridad Nacional, El Consejo de Seguridad Nacional, <https://www.dsn.gob.es/es/sistema-seguridad-nacional/consejo-seguridad-nacional>.

74 The agreements adopted by the National Security Council for the establishment of Supporting Bodies can be found here: <https://www.dsn.gob.es/es/estrategias-publicaciones/legislaci%C3%B3n-normativa>.

75 Gobierno de España, Presidencia del Gobierno, National Security Strategy: A Shared Project, 2021, <https://www.dsn.gob.es/es/documento/estrategia-seguridad-nacional-2021>.

76 Boletín Oficial Del Estado, Ley 36/2015, de 28 de septiembre, de Seguridad Nacional, <https://www.boe.es/eli/es/l/2015/09/28/36>.

advise” (Section 4.3, Law 36/2015). In this sense, the four National Security Strategies that have been published thus far build upon the legacy of its predecessors.<sup>77</sup>

The National Security Council shall meet at the initiative of the President of the Government at least every two months or as often as he/she deems necessary, as well as whenever circumstances affecting National Security so require.<sup>78</sup>

Regarding the distinction between the National Security Council and the intelligence services, on one hand, the National Security Council is a Government Delegate body whose main function is “assisting the President of the Government in directing National Security policy and the National Security System” (Section 17, Law 36/2015).<sup>79</sup> On the other hand, the National Intelligence Centre (Centro Nacional de Inteligencia) is the

Public institution responsible for providing the President of the Government and the National Government with information, analyses, studies or proposals that make it possible to prevent and avoid any danger, threat or aggression against the independence or territorial integrity of Spain, national interests and the stability of the rule of law and its institutions (Section 1, Law 11/2002 of 6 May 2002 regulating the National Intelligence Centre).<sup>80</sup>

Firstly, the National Security Council has the role of assisting the President of the Government in the direction of National Security Policy. Section 21.1 of Law 36/2015 establishes the competences of the National Security Council:

- issuing the necessary guidelines for planning and coordinating National Security policy; directing and coordinating crisis management actions under the terms provided for in Title III;
- supervising and coordinating the National Security System;
- verifying the degree of compliance with the National Security Strategy and promoting and encouraging its reviewing; promoting and encouraging the drafting of the second-level strategies that may be necessary and proceeding, where appropriate, to their approval, as well as their periodic reviews;
- organising the resource contribution to National Security in accordance with the provisions of this law;
- approving the Yearly National Security Report prior to its submission to the ‘Cortes Generales’; agreeing on the creation and strengthening of supporting bodies necessary for the performance of its functions;

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77 Ebd.

78 Gobierno de España, Presidencia del Gobierno, National Security Strategy: A Shared Project, 2021, <https://www.dsn.gob.es/es/documento/estrategia-seguridad-nacional-2021>.

79 Boletín Oficial Del Estado, Ley 36/2015, de 28 de septiembre, de Seguridad Nacional, <https://www.boe.es/eli/es/l/2015/09/28/36>.

80 Boletín Oficial Del Estado, Ley 11/2002, de 6 de mayo, reguladora del Centro Nacional de Inteligencia, <https://www.boe.es/buscar/pdf/2002/BOE-A-2002-8628-consolidado.pdf>.

- promoting the regulation proposals that are necessary for strengthening the National Security System;
- performing other functions attributed to it by the applicable legal and regulatory provisions.<sup>81</sup>

The National Security Council is essentially an advisory-body to the President of the Government, who is responsible for “directing National Security Policy and the National Security System” (Section 15(a), Law 6/2015).<sup>82</sup> In addition, it also has coordination powers.

The role played by the “Cortes Generales” [both Houses of the Spanish Parliament] in the control of National Security policy is regulated in Section 13 of Law 36/2015. In accordance with the aforementioned Section, it establishes the following:

1. Independently of the functions that the Constitution and other legal provisions assign to the ‘Cortes Generales’, it is incumbent upon them to debate the general lines of National Security policy, for which purpose the Government shall submit to them, for their knowledge and debate, the National Security Strategy, as well as the corresponding initiatives and plans.
2. A Joint Congress-Senate Committee on National Security shall be appointed at the Cortes Generales, in accordance with the provisions of the Standing Orders of both Houses of Parliament, so that the Houses may have the appropriate participation in the areas of National Security and have the broadest possible information on initiatives within the framework of National Security policy. Within this Joint Committee, the Government shall appear annually, through the representative it designates, to report on the evolution of National Security in the aforementioned reference period. Likewise, the National Security Strategy and its revisions shall be presented to this Joint Committee.<sup>83</sup>

Weiterführende Links und Literatur:

- The National Security Council approves yearly national security reports that can be consulted on its website: <https://www.dsn.gob.es/en/estrategias-publicaciones/informe-anual-seguridad-nacional>.
- The Areas strategies of the Council are also available to the public: [www.dsn.gob.es](http://www.dsn.gob.es).

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81 Boletín Oficial Del Estado, Ley 36/2015, de 28 de septiembre, de Seguridad Nacional, <https://www.boe.es/eli/es/l/2015/09/28/36>.

82 Boletín Oficial Del Estado, Ley 6/2015, de 12 de mayo, de Denominaciones de Origen e Indicaciones Geográficas Protegidas de ámbito territorial supraautonómico, <https://www.boe.es/eli/es/l/2015/05/12/6/con>.

83 Boletín Oficial Del Estado, Ley 36/2015, de 28 de septiembre, de Seguridad Nacional, <https://www.boe.es/eli/es/l/2015/09/28/36>.

### 3.11. Vereinigtes Königreich

The UK National Security Council was established in 2010. It was one of the first acts of the new Government, along with the appointment of a National Security Adviser.<sup>84</sup> Establishing a National Security Council had been a long-standing pledge of the Conservative Party. In its 2010 election manifesto, the party expressed the belief that a unified and coherent approach to national security was required to address the diversity and severity of threats facing the UK. A National Security Council would therefore be established to oversee and coordinate the Government's response.<sup>85</sup> This pledge subsequently featured in the 2010 Coalition agreement, which stated:

The Government believes that its primary responsibility is to ensure national security. We need a coherent approach to national security issues across government, and we will take action to tackle terrorism, and its causes, at home and abroad.<sup>86</sup>

This new unified approach to national security was subsequently reflected in the 2010 Strategic Defence and Security Review.<sup>87</sup>

The National Security Council has no specific legal basis. It was established as a Committee of the Cabinet and therefore no legislation was required to create it. It was established by an administrative act, using prerogative powers exercised by ministers.<sup>88</sup>

The National Security Council brings together the main government departments with national security related functions and is chaired by the Prime Minister. Its permanent members include: Deputy Prime Minister, Foreign Secretary, Home Secretary, Defence Secretary, Chancellor of the

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84 *Joe Devanny/Josh Harris*, The National Security Council: National security at the centre of government, <https://www.instituteforgovernment.org.uk/sites/default/files/publications/NSC%20final%202.pdf>.

85 David Cameron, Conservative Manifesto 2010 Promote Our National Interest Defend Our Security, 24. Januar 2010, <https://general-election-2010.co.uk/conservative-party-manifesto-2010-general-election/conservative-manifesto-2010-promote-our-national-interest-defend-our-security/>.

86 The Coalition: our programme for government, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/78977/coalition\\_programme\\_for\\_government.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/78977/coalition_programme_for_government.pdf), S. 24.

87 House of Commons Library, UK Defence and Security Policy: A New Approach?, Research Paper 11/10, 21. Januar 2011, <https://researchbriefings.files.parliament.uk/documents/RP11-10/RP11-10.pdf>.

88 Prerogative powers are those powers which a British government has historically been able to exercise without any recourse to parliamentary scrutiny or approval. Originally prerogative powers would have been exercised by the reigning monarch. However, over time a distinction has emerged between the monarch acting on his or her own capacity, and the powers possessed by the Monarch as head of state. In modern times, government ministers exercise the majority of the prerogative powers either in their own right or through the advice they provide to the Queen which she is bound constitutionally to follow. There have been calls to reform prerogative powers, chiefly because they are exercised without any parliamentary authority.

Das Vereinigte Königreich hat keine kodifizierte Verfassung, in der die Einrichtung eines solchen Gremiums festgelegt werden könnte, siehe hierzu auch *Joe Devanny/Josh Harris*, The National Security Council: National security at the centre of government, <https://www.instituteforgovernment.org.uk/sites/default/files/publications/NSC%20final%202.pdf>, S. 24-25.

Exchequer, Chancellor of the Duchy of Lancaster and Minister for the Cabinet Office, Minister of State at the Cabinet Office, Attorney General. The Chief of the Defence Staff, the Heads of the intelligence agencies (MI6, MI5 and GCHQ) and the Chairman of the Joint Intelligence Committee also attend the National Security Council. Other Cabinet Ministers in Departments that are not principally engaged with security issues also attend National Security Council sessions as the subject matter requires. In the past, external experts have also been invited for discussion on specific issues such as Afghanistan and the Middle East. An invitation to participate has also, on occasion, been extended to the Leader of the Opposition.<sup>89</sup>

A subcommittee of the National Security Council has also been established to consider all issues relating to the UK's nuclear deterrent. It is chaired by the Prime Minister and is attended by the Foreign Secretary, the Defence Secretary, Home Secretary, Chancellor of the Exchequer and the Secretary of State for Business, Energy and Industrial Strategy.<sup>90</sup>

In the event that British forces are committed to military action, constitutional convention requires that authorisation is given by the Prime Minister, on behalf of the Crown. Decisions on military action are taken within the Cabinet with advice from, among others, the National Security Council and the Chief of the Defence Staff.

The National Security Council is supported by a National Security Secretariat, based within the Cabinet Office, and headed by the National Security Adviser. The Secretariat is responsible for providing policy advice to the National Security Council, coordinating foreign and defence policy across government, coordinating policy across the intelligence community and developing effective protective security policies and capabilities for government. It is also responsible for maintaining facilities for the effective coordination of any government response to a crisis. Institutionally separate from the Secretariat, the Joint Intelligence Organisation is responsible for providing intelligence assessments to the National Security Council. The National Security Secretariat has formal responsibility for agreeing the agenda for meetings of the National Security Council. However, it will only do so following consultations with the Prime Minister, ministers and government departments, who in practice have the final say.<sup>91</sup>

The general terms of reference of the National Security Council are to consider matters relating to national security, foreign policy, defence, international relations and development, resilience, energy and resource security. The National Security Council is also responsible for the Govern-

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89 Joe Devanny/Josh Harris, The National Security Council: National security at the centre of government, <https://www.instituteforgovernment.org.uk/sites/default/files/publications/NSC%20final%202.pdf>, S. 24-25; gov.uk, National Security Council, <https://www.gov.uk/government/groups/national-security-council>; gov.uk, List of Cabinet Committees, <https://www.gov.uk/government/publications/the-cabinet-committees-system-and-list-of-cabinet-committees>.

90 gov.uk, National Security Council, <https://www.gov.uk/government/groups/national-security-council>; gov.uk, List of Cabinet Committees, <https://www.gov.uk/government/publications/the-cabinet-committees-system-and-list-of-cabinet-committees>.

91 Joe Devanny/Josh Harris, The National Security Council: National security at the centre of government, <https://www.instituteforgovernment.org.uk/sites/default/files/publications/NSC%20final%202.pdf>, S. 26-27.

ment's overarching National Security Strategy, the most recent assessment of which is incorporated in the 2021 Integrated Review of Security, Defence, Development and Foreign Policy. It is distinct from COBRA, the Cabinet Committee that is convened during times of national crisis or emergency to coordinate the Government's response.<sup>92</sup>

The National Security Council acts as a forum for collective discussion of the government's national security objectives. Thus far, the National Security Council has met on a weekly basis when Parliament is in session. Under proposed reforms, going forward the National Security Council is expected to meet for a maximum of 24 times per year, with the Prime Minister chairing approximately half of those meetings on the most strategic issues. The remaining meetings will be convened as a meeting of National Security Ministers and chaired by the most appropriate Minister for the agenda under consideration.<sup>93</sup>

Decisions on arms exports are made by the Export Control Joint Unit within the Department for International Trade. The National Security Council has no role in that process.

While the National Security Council is minuted, those minutes are not made publicly available. In the past, summaries of meetings have been provided, in confidence, to the Clerk of the Joint Committee on the National Security Strategy. Any recommendations made in the meeting are considered in Cabinet, where final decisions are made. In practice, given that many of the most senior ministers overlap, it will be rare for the Government as a whole to ignore or contradict recommendations emanating from the National Security Council.

Intelligence plays a vital role in the work of the National Security Council, with the heads of all three intelligence services, the National Security Adviser and the Chairman of the Joint Intelligence Committee attending its meetings. The National Security Adviser now acts as the coordinator for intelligence enabling him to engage with Ministers on the priorities for intelligence and to support the National Security Council in its detailed consideration of policy issues affecting the services.<sup>94</sup>

The Joint Committee on the National Security Strategy (JCNSS)<sup>95</sup> was established in the 2005-2010 Parliamentary session to consider issues relating to the UK's National Security Strategy and the structures for Government decision making on national security. After the creation of the National Security Council and the post of National Security Adviser in 2010, the committee included the work of the National Security Council and the National Security Adviser within its

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92 gov.uk, The Integrated Review 2021, <https://www.gov.uk/government/collections/the-integrated-review-2021>.

93 Joe Devanny/Josh Harris, The National Security Council: National security at the centre of government, <https://www.instituteforgovernment.org.uk/sites/default/files/publications/NSC%20final%202.pdf>, S. 24.

94 Ebd., S. 27-30.

95 UK Parliament, National Security Strategy (Joint Committee), <https://committees.parliament.uk/committee/111/national-security-strategy-joint-committee/>.



remit. The JCNSS has published numerous reports on the National Security Council. Its most recent was in September 2021, in which it examined proposed reforms to the structure of the National Security Council.<sup>96</sup> Previous JCNSS reports can be found online.<sup>97</sup>

Other committees have also occasionally examined the work and role of the National Security Council in relation to broader defence and foreign policy issues. The Defence Committee examined the role of the National Security Council as part of its wider enquiry into Decision Making in Defence Policy and specifically section 4 of that report.<sup>98</sup> More recently the Committee also examined the National Security Council in its August 2020 report.<sup>99</sup> The Public Administration Select Committee also examined the National Security Council as part of a broader inquiry in 2012 into Strategic thinking within Government.<sup>100</sup>

#### Weiterführende Links und Literatur:

- GOV.UK, National Security Council, <https://www.gov.uk/government/groups/national-security-council>.
- GOV.UK, National Security Secretariat: About Us, <https://www.gov.uk/government/organisations/national-security/about>.
- GCHQ, National Security Council, <https://www.gchq.gov.uk/organisations/national-security-council>.
- RUSI Newsbrief, “How to unlock the National Security Strategy”, 5. November 2021, <https://rusi.org/explore-our-research/publications/rusi-newsbrief/how-unlock-national-security-strategy>.
- *Celia G. Parker*, “National Security Council: Why it would be unwise to reduce its role”, London School of Economics Blog, September 2020, <https://blogs.lse.ac.uk/politicsand-policy/national-security-council-johnson/>.
- *Joe Devanny/Josh Harris*, The National Security Council: National security at the centre of government, <https://www.instituteforgovernment.org.uk/sites/default/files/publications/NSC%20final%20202.pdf>.

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96 Joint Committee on the National Security Strategy, The UK’s National Security Machinery, September 2021, <https://committees.parliament.uk/publications/7375/documents/77226/default/>. Für die Antwort der britischen Regierung auf den Bericht, siehe Joint Committee on the National Security Strategy, The UK’s National Security Machinery: Government Response to the Committee’s First Report, Dezember 2021, <https://committees.parliament.uk/publications/8138/documents/83424/default/>.

97 UK Parliament, National Security Strategy (Joint Committee), <https://committees.parliament.uk/committee/111/national-security-strategy-joint-committee>.

98 House of Commons, Defence Committee, Decision-making in Defence Policy, März 2015, <https://publications.parliament.uk/pa/cm201415/cmselect/cmdfence/682/682.pdf>.

99 House of Commons, Defence Committee, In Search of Strategy – The 2020 Integrated Review, <https://committees.parliament.uk/publications/2265/documents/21808/default/>.

100 UK Parliament, Public Administration Committee, Strategic thinking in Government: without National Strategy, can viable Government strategy emerge?, <https://publications.parliament.uk/pa/cm201012/cmselect/cmpubadm/1625/162504.htm>.

- *Joe Devanny*, “Coordinating UK foreign and security policy: the National Security Council,” *The RUSI journal* 2015, <http://dx.doi.org/10.1080/03071847.2015.1122977>, S. 20-26.

### 3.12. Vereinigte Staaten von Amerika

The National Security Council was established by the National Security Act of 1947 (PL 80-253), and was amended by the National Security Act Amendments of 1949 (PL81-215). Later in 1949, the Council was placed in the Executive Office of the President.<sup>101</sup>

Today, the National Security Council is chaired by the President. Its regular attendees are the Vice President, the Secretary of State, the Secretary of the Treasury, the Secretary of Defense, the Secretary of Energy, the Attorney General, the Secretary of Homeland Security, the Representative of the United States of America to the United Nations, the Administrator of the U.S. Agency for International Development, the Chief of Staff to the President, and the Assistant to the President for National Security Affairs. The Chairman of the Joint Chiefs of Staff is the military advisor to the Council, and the Director of National Intelligence is the intelligence advisor. Counsel to the President and the Legal Advisor to the National Security Council are invited to attend every National Security Council meeting.<sup>102</sup>

The National Security Council today has four primary functions:

- advise the President with respect to the integration of domestic, foreign, and military policies relating to the national security so as to enable the Armed Forces and the other departments and agencies of the United States Government to cooperate more effectively in matters involving the national security;
- assess and appraise the objectives, commitments, and risks of the United States in relation to the actual and potential military power of the United States, and make recommendations thereon to the President;
- make recommendations to the President concerning policies on matters of common interest to the departments and agencies of the United States Government concerned with the national security; and
- coordinate, without assuming operational authority, the United States Government response to malign foreign influence operations and campaigns.<sup>103</sup>

Concerning the structure of the National Security Council, a report by the Congressional Research Service of June 2021 comments:

Presidents have latitude to structure and use the NSC as they see fit. In practice, the NSC staff’s activities now extend somewhat beyond providing policy advice. First, as one former

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101 The White House, National Security Council, <https://www.whitehouse.gov/nsc/>.

102 Ebd.

103 Ebd.

NSC official notes, “White House involvement is often needed for precise execution of policy, especially when secrecy is required to perform delicate tasks.” Second, the rise in strategic importance of transnational threats such as terrorism and narco-trafficking, along with post-Cold War military campaigns in the Balkans, Iraq, and Afghanistan, has increasingly necessitated “whole of government” responses that leverage diplomatic, military, and development tools from a variety of different U.S. government agencies. The NSC often coordinates such responses, and as the international security environment has become more complex, whole-of-government responses to individual crises have become more frequent, translating into even greater NSC involvement. This expanding role is leading many scholars and practitioners to question the appropriate size, scope and role for the NSC.<sup>104</sup>

Two avenues for reform have been proposed: one would expand the National Security Council, while the other would shrink the National Security Council.<sup>105</sup>

Recommendations or decisions from the National Security Council have not often been made public, nor is the National Security Council accountable to Congress.

The National Security Council is not a primary and regular source of national security information for Congress. National security information is for the most part provided by those departments and agencies that are represented on the National Security Council. The National Security Council, as a corporate entity, rarely testifies before or briefs Congress on substantive questions, although in some Administrations informal briefings have been provided.

Weiterführende Literatur und Links:

- Congressional Research Service, Report R44828: “The National Security Council: Background and Issues for Congress”, 3. Juni 2021 <https://crsreports.congress.gov/product/pdf/R/R44828>.
- Office of the Historian at the Department of State, History of the National Security Council, 1947-1997, August 1997, <https://irp.fas.org/offdocs/NSChistory.htm>.
- The White House, National Security Council, <https://www.whitehouse.gov/nsc/>.
- *Peter L. Bergen*, Trump and his generals: the cost of chaos, Penguin Press 2019.
- *Richard A. Best*, The National Security Council: an organizational assessment, Novinka Books 2001.
- *Vincent Boucher/Charles-Philippe David/Karine Prémont*, National security entrepreneurs and the making of American foreign policy, McGill-Queen's University Press 2020.
- *Nikolas K. Gvosdev*, “How US national security decisions are made”, Orbis: FPRI's journal of world affairs, 2017, <http://dx.doi.org/10.1016/j.orbis.2016.12.005>, S. 27-33.
- *Frank G. Hoffman/Ryan Neuhard*, “Avoiding strategic inertia: enabling the National Security Council”, Orbis: FPRI's journal of world affairs, 2016, <http://dx.doi.org/10.1016/j.orbis.2016.01.003>, S. 217-236.

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104 Congressional Research Service, The National Security Council: Background and Issues for Congress, 3. Juni 2021, <https://crsreports.congress.gov/product/pdf/R/R44828>, S. 9.

105 Ebd., S. 9-10.

- *Friedrich Korkisch*, Die amerikanische Sicherheitspolitik: dargestellt an der Geschichte des "National Security Council", Österreichische militärische Zeitschrift, 1990, S. 36-45 (Teil I), 114-120 (Teil II), 219-228 (Teil III).
- *Tyler Wesley*, "Multi-domain operations and lessons from NSC 68 in the competitive space: a framework for NATO and Western democracies for defence against Russia", The RUSI journal, 2020, <https://doi.org/10.1080/03071847.2020.1811140>, S. 22-31.

#### 4. Ausgewählte Staaten ohne Nationalen Sicherheitsrat

##### 4.1. Norwegen

There is no National Security Council in Norway. However, the need for a better coordination of security policies has been the subject of political debate for years. For example:

- In 2000, a report from a commission appointed by the government (the Committee on the Vulnerability of Society) proposed a separate Ministry of Security. However, the proposal was not implemented.
- After the terrorist attacks of 22 July 2011, the lack of coordination was emphasised by the commission that reviewed the terrorist attacks.
- The commission reviewing the authorities' handling of the COVID-19 pandemic found that the Government was unprepared when the COVID-19 pandemic arrived, and that they had paid little attention to how risk in one sector is affected by risks in other sectors. Lack of coordination between different authorities in the security field has also been documented in reports from the Office of the Auditor General.

The commission that reviewed the terrorist attacks of 22 July 2011 emphasized attitudes, culture and leadership as main challenges, rather than organizational structures:

In the view of the Commission, the main challenges after 22 July are related to attitudes, culture and leadership. Leadership has to start at the top. We are therefore of the opinion that the country's leadership, represented by the Government Security Council and the Government's Emergency Council, must spend more time on awareness of threat and risk levels and on ensuring good interaction and responses in the light of the challenges arise.

In addition, the Commission has considered whether there is also a need for a change in the division of work in the community of ministries, not least as recommended by the Committee on the Vulnerability of Society. We have considered recommending that the coordination of security and emergency tasks be assigned to the Office of the Prime Minister, in order to put sufficient power behind the task, as is the model in Great Britain. However, civil protection is merely one of several important tasks that the Government must resolve jointly, and it is difficult to see that one area should be brought to the fore in such a manner. There are close links between police duties and society's general security and emergency preparedness, a factor that speaks in favour of the police and coordination of security being organised together.

During the years that have passed since the Committee on the Vulnerability of Society suggested the creation of a separate Ministry of Security, the Ministry of Justice and Public Security has been assigned a great many of the duties that were proposed to be brought together. The Commission sees that the ministry already has a broad area of responsibility and large portfolio of duties. In future, when the Ministry of Justice and Public Security tries to strengthen its role as coordinator at the same time as it has to get far more involved in the leadership of its subordinate agencies, we see that this may entail capacity problems. The Commission is not qualified to determine whether this capacity challenge can be resolved within the ministry, or whether it is necessary to transfer considerable responsibilities to another ministry, but this is an issue that merits attention. Notwithstanding, the Commission's view is that the structural organisational challenges are less important than the challenges related to attitudes, culture and leadership. We have seen few examples of formal organisation being a limiting factor. We have seen many examples of leadership not utilising the potential in its own organisation.<sup>106</sup>

While no National Security Council has been established, other structures have been developed and strengthened in order to coordinate and strengthen the security policies. There has been debate over how effective these structures are.

The Government Security Committee (Regjeringens sikkerhetsutvalg, RSU) is mentioned in the above quote (translated as "council"). The RSU is the highest body for discussing security issues in Norway. The Prime Minister, the Minister for Foreign Affairs, the Minister for Defence, the Minister for Justice and Public security, and the Minister for Finance are normally permanent members of the Security Committee. The Prime Minister's office is the secretariat for the RSU. Officials and heads of departments can be summoned to the meetings. The RSU has been strengthened somewhat after the report from the 22 July commission. According to the Office of the Prime Minister, the work in the RSU has been systematized to ensure strategic management of security policy crises with a permanent secretariat to strengthen the work in the committee. If needed, the RSU will ask for continuous information from the civil and military service.<sup>107</sup>

Furthermore, the Ministry of Justice and Public Security, which has the day-to-day responsibility for public security, has become the permanent leading ministry during civil national crises, unless otherwise decided or the crisis is clearly limited to one sector. The Ministry now has several of the functions that the above mentioned Vulnerability Committee proposed to gather in a Ministry of Security.

Weiterführende Links und Literatur:

- <https://www.regjeringen.no/en/dokumenter/nou-2012-14/id697260/>
- <https://www.regjeringen.no/contentassets/5d388acc92064389b2a4e1a449c5865e/no/sved/01kap02engelsk.pdf>

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106 Norges offentlige utredninger, Rapport fra 22. juli-kommisjonen, 13. August 2012, [https://www.regjeringen.no/contentassets/bb3dc76229c64735b4f6eb4dbfcdbe8/en-gb/pdfs/nou2012\\_14\\_eng.pdf](https://www.regjeringen.no/contentassets/bb3dc76229c64735b4f6eb4dbfcdbe8/en-gb/pdfs/nou2012_14_eng.pdf).

107 Norwegian Ministry of Justice and Public Security/Norwegian Ministry of Defence, Support and Cooperation: A description of the total defence concept today, 9. April 2015, [https://www.regjeringen.no/globalassets/departementene/fd/dokumenter/fd\\_stotte-samarbeid\\_eng\\_korr.pdf](https://www.regjeringen.no/globalassets/departementene/fd/dokumenter/fd_stotte-samarbeid_eng_korr.pdf), S. 56.

- <https://www.regjeringen.no/en/dokumenter/nou-2022-5/id2910055/>

#### 4.2. Schweden

There is no National Security Council in Sweden.

The State Secretary to the Prime Minister has a special role in the coordination of security matters, which has been strengthened over the years:

- He leads the overall crisis management process in the Government, assesses the need for coordination at the Government Offices, and can convene a meeting of a Strategic Coordination Group, comprising state secretaries at the ministries whose areas of activity are affected.<sup>108</sup>
- The State Secretary to the Prime Minister is supported by a special Director-General and a Crisis Management Coordination Secretariat which are part of the Government Offices. The Director-General's responsibilities include ensuring that the Government Offices makes necessary preparations for crisis management response. This may include early warning, training and exercises to increase crisis management capacity in general. The Crisis Management Coordination Secretariat monitors developments both nationally and internationally to be able to raise an alert and produce comprehensive status reports and a picture of the combined impact on society of all individual events. After a crisis, the Secretariat follows up and evaluates the measures taken.<sup>109</sup>
- The State Secretary to the Prime Minister also heads the Crisis Management Council, which was established by the Government in 2008. The Council normally meets twice a year for a general briefing on contingency planning but may also meet for information sharing during serious incidents and crises. It normally includes the National Police Commissioner, the Head of the Swedish Security Service, the Supreme Commander of the Armed Forces and the Directors-General of Svenska kraftnät (the Swedish national grid), the Swedish Civil Contingencies Agency, the Swedish Post and Telecom Authority, the National Board of Health and Welfare, the Swedish Radiation Safety Authority, a representative of the county administrative boards and representatives of the ministries responsible for the relevant agencies. Previously, all these functions came under the Ministry of Justice, but since winter 2021/22 they are situated in/headed by the State Secretary of the Prime Minister's Office.<sup>110</sup>

Since 2014, there is also a security policy council in the Prime Minister's Office, for the exchange of information on issues relating to national security. Meetings of the council are chaired by the

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108 Government Offices of Sweden, Crisis management at the Government Offices, 12. Januar 2022, <https://www.government.se/government-policy/emergency-preparedness/crisis-management-at-the-government-offices/>.

109 Ebd.

110 Ebd.

Prime Minister. The council is not a decision-making body but a forum for the discussion of strategic issues.

The question of establishing a National Security Council has been raised on several occasions in recent years in private members' motions in the Swedish Riksdag. Until spring 2019 proposals to establish a National Security Council were rejected mainly with reference to existing structures and the established view that it is not the task of the Parliament to make decisions on matters relating to the organization of the Government Offices. However, in spring 2019, the Riksdag approved a number of private members' motions proposing the creation of a National Security Council. By way of a so-called announcement<sup>111</sup>, the Riksdag called on the Government to carry out a review of the central crisis management organization with the aim of creating a National Security Council for crisis management in the Prime Minister's Office.

In its written communications on measures taken in connection with announcements by the Riksdag in 2020 and 2021, the Government stated that the issue of creating a National Security Council was being analysed in the Government Offices. The Government also underlined the organizational changes made within the Government Offices that tie crisis management closer to the Prime Minister. Government's ongoing analysis of the issue is related mainly to the work presented by two recent commissions of inquiry, whose proposals are currently being considered in the Government Offices:

- In August 2018, the Swedish Government appointed a Commission on Civil Defence with the task of analysing and proposing a structure for responsibility, management and coordination of civil defence at central, regional and local level. The Government declared a need for clearer roles and responsibilities and strengthened coordination in the area of civil defence to enhance the nation's preparedness for war as well as for peacetime crises. The Commission presented its report to the Government in spring 2021. The Commission proposed, inter alia, the establishment of an interagency crisis preparedness council, co-chaired by the Director-General of the Swedish Civil Contingencies Agency and the Supreme Commander of the Armed Forces.<sup>112</sup>
- In June 2020, the Government appointed a Commission to evaluate Sweden's handling of the COVID-19 pandemic, including the crisis management organization in the Government Offices, the relevant government agencies, the regions and the municipalities. The Commission presented its final report to the Government in February 2022. The report concluded, inter alia, that the Government should have assumed leadership of all aspects of crisis management from the outset, and that it should have been able to overcome cur-

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111 An announcement (Swe. *tillkännagivande*) is a constitutionally non-binding resolution, but which may be considered "politically" binding. If the Government does not have the intention to meet the Riksdag's wishes, it should, in accordance with constitutional practice, notify the Riksdag and state its reasons for this. The Government submits an annual written communication to the Riksdag on measures taken in connection with each announcement made by the Riksdag that is yet to be finalized.

112 Siehe auch den Swedish Defence Commission, Resilience: The total defence concept and the development of civil defence 2021-2025, 20. Dezember 2017, <https://www.regeringen.se/4afeb9/globalassets/regeringen/dokument/forsvarsdepartementet/forsvarsberedningen/resilience---report-summary---20171220ny.pdf>.

rent obstacles to clear national leadership, such as government agencies with a high degree of autonomy, self-governing regional and municipal councils, and the Government Offices' normal procedures for preparing government business. In the Commission's view, the Government should also have assumed clearer leadership of overall communication with the public. One of the Commission's key overall observations and lessons for the future was that "a body providing clear national crisis leadership should be established, reporting directly to the Government".<sup>113</sup>

#### Weiterführende Links und Literatur:

- *Fredrik Bynander/Per Becker*, The System for Crisis Management in Sweden: Collaborative, Conformist, Contradictory, in: *Christian N. Madu/Chu Hua Kuei* (Hrsg.), Handbook of Disaster Risk Reduction and Management, S. 69-95.
- Government Offices, Crisis management at the Government Offices, updated 12 January 2022. <https://www.government.se/government-policy/emergency-preparedness/crisis-management-at-the-government-offices/>.
- Government Official Report 2022:10, Summary in English, <https://www.regeringen.se/492d13/globalassets/regeringen/block/fakta-och-genvagsblock/socialdepartementet/sjukvard/coronakommissionen/summary.pdf>.

#### 4.3. Schweiz

There is no National Security Council in Switzerland. Its creation has not been subject to discussion. However, since 2012 a National Security Network has been established to ensure greater coordination between the Confederation and the cantons on security policy matters. Confederation and cantons are represented on equal terms in the bodies of the Swiss Security Network. In the Swiss Security Network's working groups partners from towns, communes and the private sector may also be represented. In accordance with a definite agenda, they address topics relating to security policy that concern both confederation and cantons and where coordination is necessary. The bodies of the Swiss Security Network primarily play a role prior to and after a crisis and, in particular, at the strategic level.<sup>114</sup>

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113 Government Official Report 2022:10, Summary in English, <https://www.regeringen.se/492d13/globalassets/regeringen/block/fakta-och-genvagsblock/socialdepartementet/sjukvard/coronakommissionen/summary.pdf>.

114 Sicherheitsverbund Schweiz, The Swiss Security Network, its structure and activities Explanatory brochure, <https://www.svs.admin.ch/en/home.html>.



## 5. Fazit

Seit den 1990er Jahren wird in Deutschland kontrovers über die Einführung eines Nationalen Sicherheitsrats bzw. die Ausweitung/Aufwertung des Bundessicherheitsrats diskutiert. Hierzu wurden mehrere Vorschläge entwickelt, die sich teilweise an Nationalen Sicherheitsräten anderer Staaten orientieren. Wie die Ausführungen zu Nationalen Sicherheitsräten in anderen Staaten zeigen, sind diese teilweise sehr unterschiedlich aufgestellt und haben andere Aufgaben und Kompetenzen. Auch sind die Kontrollmechanismen und Transparenzregeln der Nationalen Sicherheitsräte verschiedenartig ausgestaltet. Die Beispiele Norwegen, Schweden und Schweiz zeigen, dass sich in Staaten, in denen kein Nationaler Sicherheitsrat existiert, andere Mechanismen zur Koordination von Außen- und Sicherheitspolitik entwickelt haben, teils in Folge neuer Herausforderungen. In Norwegen und Schweden gibt es zwar ebenfalls Forderungen nach der Einführung eines Nationalen Sicherheitsrats. Diese konnten sich bislang aber nicht durchsetzen.

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