

# ISPA Belgium – position note on the integration of the TANK platform under the e-Evidence Regulation

The European e-evidence regulation aims to simplify and standardize cross-border access to electronic evidence. ISPA Belgium supports the goals of improved cooperation and swift access to data for law enforcement, but underlines the importance of building on existing national systems that are secure, operational, and trusted by all stakeholders. In Belgium, the TANK platform is the national tool used by operators to process judicial data requests in a secure, traceable, and efficient way. ISPA members therefore call for the integration of the TANK platform into the EU's decentralized IT system for e-evidence.

# TANK as the operational standard in Belgium

All telecom operators active in Belgium currently use and maintain the platform. The system is fully embedded in their daily operations and ensures both compliance and efficiency. TANK has been designed to comply with national legal requirements for cooperation with judicial authorities. Additionally, TANK receives number location information from the number portability platform, allowing requests to be routed to the appropriate operator or MVNO based on the phone number.

### Technical considerations - feasibility and time to implementation

Developing and implementing a complex data exchange platform is a time-intensive and resource-heavy process. In contrast, adapting the TANK platform for cross-border requests is entirely feasible and could be achieved within a few months. Establishing a connection to a separate, parallel EU system would likely take significantly longer, due to the extensive coordination required for secure infrastructure development, VPN and firewall setup, IP alignment, and user interface creation—tasks that span multiple teams and systems.

#### Cost implications - avoiding duplicative investments

Beyond technical feasibility and time, the financial dimension is also a major concern. Considerable resources have already been invested in the development and upkeep of TANK. This includes aligning internal systems with standardised platform parameters and making significant adaptations to pre-existing infrastructures. Creating and maintaining a second, parallel system would multiply both the initial investment and ongoing maintenance costs, placing an unsustainable burden on operators without clear added value.

# Operational impact – preserving continuity and efficiency

The coordination cell responsible for processing judicial inquiries operates with constant availability, given the urgent nature of many requests. Managing national and European requests through separate platforms would increase operational complexity, risk inefficiencies, and may lead to delays or challenges in meeting service-level agreements. The same holds true for IT operations: maintaining two distinct systems would increase the technical burden, complicate workflows, and reduce overall efficiency.

## Conclusion – integration of existing national infrastructure

ISPA Belgium strongly encourages the Belgian authorities to advocate for the integration of the TANK platform into the EU's decentralized e-evidence system. Building on existing infrastructure would help avoid duplication, reduce unnecessary costs, and ensure operational continuity. It would also maintain the well-functioning cooperation framework between operators and judicial authorities. A practical and secure implementation of the e-evidence regulation should take into account national systems that are already operational and effective..