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CM 5136/10

Subject: Classification systems of terrorist threat levels in the EU Member States

Following up on the discussion by the Ministers during their lunch in the margins of the Council (Justice and Home Affairs) on 7-8 October 2010 regarding national threat levels (cf. doc. 14783/10 JAI 830 CATS 79 COSI 65 ENFOPOL 281 COTER 70), a questionnaire was sent out in order to compile an overview of the systems and classifications used by the Member States including an explanation on how the threat levels are defined and which structure is responsible for changes in the level of threat.

All delegations and the European Commission have responded to the questionnaire, and the current document summarises the replies received.

10 Member States that replied have a system of assessing the terrorist threat on a regular basis but do not have a formalised classification system (scale) of terrorist threat levels (BG, CZ, DE, EE, IT, CY, LU, AT, SK, FI). However, CY and SK envisage introducing such a system¹.

¹ In CY this task is included in the agenda of the newly appointed National Counter Terrorism Coordinator, and in SK a paper with various proposals is being prepared in view of its submission to the High Level Expert Group in January 2011.

The majority of the Member States (17) - BE, DK, IE, EL, ES, FR, LV, LT, HU, MT, NL, PL, PT, RO, SI, SE and UK as well as the European Commission have established a system classifying the terrorist threat into levels. In HU and PL, the system of terrorism threat levels is under revision. LT introduced a system of terrorist threat levels in November 2010.

A distinction should be made between the terms "threat level" and "alert level". The "alert level" relates to a "posture" assumed by the competent authorities in the Member States on the basis of a "threat level" which is determined by threat assessment. The systems and classifications of progressive levels used in the Member States are based on either one or other of these concepts, or on a combination of both. The current document provides mainly an overview of threat levels, having been drawn up on the basis of a questionnaire focusing on this subject (CM 5136/10).

The Member States use different characteristics to identify threat levels: some countries use words (DK, IE, ES, MT, NL, UK), some use numbers (BE, EL, SE) and some use colours (FR, LV, RO) to define a threat level. HU used letters under its old system. Furthermore, some of the countries combine several of these criteria (LT and SI combine words and colours, PT combines numbers and a letter, and PL combined numbers and colours under its old system). COM uses a system based on numbers.

As regards the number of threat levels, apart from SI that distinguishes between 3 levels and PT that has a system of 6 levels, the countries use a 4 or a 5 level scale: 4 levels in BE, EL, FR, LV, HU, NL, PL and 5 levels in DK, IE, ES, LT, MT, RO, SE and UK. COM also uses a 5-level system.

The descriptions of the nature of the threat also vary to some extent:

- While the colours used are not identical, in all the systems orange and red colours are associated with a high and a critical threat level respectively, and the green colour indicates the lowest level of threat in the majority of the classification systems based on colours.
- Numbers are used in a different order in different Member States with "1" standing for the highest threat level in one country (PT) and for the lowest one in three other countries (BE, EL, SE).

- The words used to define the levels of threat vary considerably.
 - a) The lowest threat level is defined either by noting that the terrorist threat is unlikely (DK, IE, LT, NL, RO, UK, COM), weak (EL), inexistent (BE), of general nature (LV, ES) or that there is no intelligence indicating the threat (MT), the consequences of the attack would produce no results (PT), the type and scope of the event is difficult to foresee (PL), or that there is a serious threat that a terrorist act would be committed in an EU, NATO or other country or that an attack has already been committed (SI).
 - b) The highest threat level is most often called imminent (BE, IE, ES, LT, LV, RO, UK, COM) but is also referred to as real (SI), critical (EL), very likely (DK) or that an individual/group has the capability and intent to commit an act of serious violence in the immediate future (MT), that there are strong indications that an attack will take place (NL) or that it would achieve very significant results (PT). Some countries also include the terrorist attacks which have already been carried out to their definition (PT, SI, PL, LV).

The institutions responsible for the change in the level of threat differ as well. In about half of the Member States where a classification of threat levels exists such a decision is entrusted to the bodies responsible for counter-terrorism or security matters, for example the Coordination Unit for Threat Analysis (BE), the Security Police (LV), the National Intelligence Cell (MT), the National Coordinator for Counterterrorism (NL, in case of the Terrorist Threat Assessment), the Security Intelligence Service (PT), the Joint Terrorism Analysis Centre and the Security Service (UK) or the Centre for Terrorist Threat Assessment (SE).

In other Member States the decision is taken by the political authorities based on the proposal of the relevant services, for example the Minister of Citizen Protection (EL), the Minister of Security and Justice (NL, in case of the Counterterrorism Alert System), the Minister of Interior (ES), the Prime Minister (DK, FR and the old PL system), the Government (LT), the National Security Committee (IE), the National Security Council (SI) or the Supreme Council for National Defence (RO).

TABLE OF FORMALISED CLASSIFICATION SYSTEMS OF TERRORIST THREAT LEVELS IN MEMBER STATES

MS	Number of threat levels	Indicators of threat levels	Threat levels distinguished (in the ascending order)	Description of the lowest threat level	Description of the highest threat level	Institution responsible for a change in the threat level
BE	4	Numbers	1 (low threat) 2 (medium threat) 3 (high threat) 4 (very high threat)	The threat is improbable or inexistent	The threat is very serious and imminent	Belgian Coordination Unit for Threat Analysis
DK	5	Words	No threat Low threat Medium threat High threat Very high threat There are 5 states of alert: daily state of alert, slightly elevated state of alert, elevated state of alert, severely elevated state of alert and fully established state of alert.	There are no indications of a threat. There is no recognized capacity or intention. Attack or injurious activities are unlikely.	There is a specific threat. There is capacity, intention, planning activities and likely execution. Attack or injurious activities are very likely.	The level of the threat is discussed among the national operative staff which normally includes police, intelligence services (police and military), emergency management agency, the National Board of Health and Defence Command Denmark. Additional sectors can be involved. The proposal is handled at two administrative levels and then the decision is taken at the Prime Minister's Office at governmental level. The security and intelligence service (police) informs about the changes in the threat level.

MS	Number of threat levels	Indicators of threat levels	Threat levels distinguished (in the ascending order)	Description of the lowest threat level	Description of the highest threat level	Institution responsible for a change in the threat level
EL	4	Numbers for threat levels and colours for alerts	Threat levels are associated with alerts: Level 1 (low threat) - white alert Level 2 (medium threat) - yellow alert Level 3 (high threat) - orange alert Level 4 (critical threat) - red alert	The level of risk is evaluated as weak	The level of risk is evaluated as critical	The Director-General of the Hellenic Police is responsible for suggesting the escalation/de-escalation of incidents/threats, which is ratified by the Minister for Citizen Protection. The decision of the Director-General of the Hellenic Police is drawn up during a meeting of the Crisis Management Council, although in exceptional and urgent circumstances, when there is not enough time to convene the Crisis Management Council, the Director-General makes his proposal directly.

MS	Number of threat levels	Indicators of threat levels	Threat levels distinguished (in the ascending order)	Description of the lowest threat level	Description of the highest threat level	Institution responsible for a change in the threat level
ES	5 ¹	Words (threat levels are assigned a level of activation)	Normal Medium (level 1) High (level 2) Very high (level 3) Extreme (level 4)	The threat carries a risk of generic terrorist activity	There is an imminent risk of a terrorist attack	This competence lies with the Minister of Interior, via the State Secretary for Security, who is responsible for determining the appropriate level of activation of the operational prevention and protection measures set out in the Counterterrorism Prevention and Protection Plan in accordance with the threat level established for the period of time, event, geographical sector or area, or activity.
FR	4	Colours	Yellow - threat is undefined (<i>imprécise</i>) Orange - threat is likely (<i>plausible</i>) Red - threat is highly likely (<i>hautement probable</i>) Scarlet - full certainty of the threat (<i>certaine</i>)	The threat is undefined	There is full certainty of the threat	The General Secretariat for Defence and National Security consults with ministries based on the threat level assessment undertaken by the intelligence services. The Prime Minister decides on a change in alert status.

¹ In ES within each of the four threat levels there are two degrees of intensity, high or low, which determine whether the planned measures are carried out in full or only in part.

MS	Number of threat levels	Indicators of threat levels	Threat levels distinguished (in the ascending order)	Description of the lowest threat level	Description of the highest threat level	Institution responsible for a change in the threat level
IE	5	Words	Low threat Moderate threat Substantial threat Severe threat Critical threat	An attack is unlikely	An attack is imminent	National Security Committee
HU ¹	4	Letters	A, B, C, D			
LT	5	Words and colours	The lowest threat (green) Low threat (blue) Medium threat (yellow) High threat (orange) The highest threat (red)	A terrorist act is possible, but not likely	A terrorist act is almost imminent	The Government of the Republic of Lithuania enacts resolutions to change a threat level of the terrorist act based on information from State Security Department of the Republic of Lithuania.
LV	4	Colours	Blue (low threat) Yellow (elevated threat) Orange (high threat) Red (very high threat)	Existing terrorist threat is of a general nature	Terrorist act has occurred or an act of terrorist is imminent	Security Police (publicly declared by the Minister of Interior)

¹ The HU national threat system is currently under revision.

MS	Number of threat levels	Indicators of threat levels	Threat levels distinguished (in the ascending order)	Description of the lowest threat level	Description of the highest threat level	Institution responsible for a change in the threat level
MT	5	Words	No known threat Low threat Medium threat High threat Imminent threat	No intelligence indicating a threat	Intelligence has identified an individual or a group within the Maltese Islands or abroad which is assessed as having the capability and the intent to commit an act of serious violence against a specific target in the immediate future	The level of threat is drawn up by the National Intelligence Cell chaired by the National Counter Terrorism Coordinator and made up of the Security Service, Police, Armed Forces, Manager Airport Security, Customs and Transport Malta as permanent members and other entities are invited ad hoc according to the threat being discussed.
NL ¹	4	Words	Minimal threat Limited threat Substantial threat Critical threat	It is unlikely that attacks are being planned	There are strong indications that an attack will take place in the Netherlands	Final responsibility for setting the threat levels lies within the National Coordinator for Counterterrorism
NL	4	Words	Standard threat Low threat Moderate threat High threat			The Minister of Security and Justice (publicly) announces the alert level for a specific sector which is based on a threat analysis of the National Coordinator for Counterterrorism for a specific sector

¹ NL is mentioned twice in the table as it has three distinguished systems of terrorist threat evaluation, two of which comprise terrorist threat levels. The first line summarises the threat levels established by the general system, Terrorist Threat Assessment, and the second one refers to the Counterterrorism Alert System, which is developed to assess terrorist threat levels within specific business sectors.

MS	Number of threat levels	Indicators of threat levels	Threat levels distinguished (in the ascending order)	Description of the lowest threat level	Description of the highest threat level	Institution responsible for a change in the threat level
PL ¹	4	Numbers and colours	I level (green) II level (yellow) III level (orange) IV level (red)	Obtaining information on the possibility of occurrence of an event of terrorist nature or other event whose type and scope is difficult to foresee (monitoring/identification)	Occurrence of an event of terrorist character or other event posing threat to Poland or other countries (attack/reaction)	The Counter-Terrorist Centre of the Internal Security Agency recommends the Interministerial Team for Terrorist Threat to make relevant suggestion to the Prime Minister who makes the final decision
PT	5+1	Numbers and a letter	5 (low threat) 4 (average threat) 3 (significant threat) 2 (high threat) 1 (immediate threat) Z (real threat)	The attack, in case it were perpetrated against a person, an installation or an event would produce no results on the internal level and would serve no purpose to the organisation	1 - The organisation committing such action would achieve very significant results Z - Whenever a VIP may be targeted by hostile actions that however will not put the VIP's life at risk another classification, dubbed "Z" "Real Threat" is further or independently applied to the 1 to 5 scale	Portuguese Security Intelligence Service

¹ The PL national threat system is currently under revision.

MS	Number of threat levels	Indicators of threat levels	Threat levels distinguished (in the ascending order)	Description of the lowest threat level	Description of the highest threat level	Institution responsible for a change in the threat level
RO	5	Colours	Green (low threat) Blue (cautious threat) Yellow (moderate threat) Orange (high threat) Red (critical threat)	According to the available information and recent events a terrorist attack is unlikely to occur	According to the available information and recent events there is an imminent risk of terrorist attacks	The alert level or a change of level is determined by the decision of Supreme Council for National Defence, at the proposal of the national authority in preventing and countering terrorism.
SE	5	Numbers	1. No threat 2. Low threat 3. Elevated threat 4. High threat 5. Very high threat	No threat	Very high threat	The responsibility to monitor and assess the terrorist threat against Sweden and Swedish interests is vested in the Swedish Centre for Terrorist Threat Assessment.

MS	Number of threat levels	Indicators of threat levels	Threat levels distinguished (in the ascending order)	Description of the lowest threat level	Description of the highest threat level	Institution responsible for a change in the threat level
SI	3	Colours and words	Low - green Middle - yellow High - red	There are circumstances indicating that a terrorist act might be committed in the territory of the Republic of Slovenia. It is likely that such an act might be committed in neighbouring countries. There is a serious threat that a terrorist act will be committed in EU, NATO or other countries, or such an act has already been committed.	There are circumstances indicating a real danger that a terrorist act will be committed in the Republic of Slovenia, or such an act has been committed in the territory of the Republic of Slovenia.	At the national level the National Security Council is responsible for the change in a threat level, however, this is not formally defined. The Council makes its decision on the basis of a proposal prepared by the Interdepartmental Working Group for Combating Terrorism and Interdepartmental Working Group for Combating International Threats ¹ .

¹ The relations between the National Security Council and the Interdepartmental Working Group for Countering International Threats Interdepartmental Working Group for Combating Terrorism are not yet clearly defined but they should be defined in the following months.

MS	Number of threat levels	Indicators of threat levels	Threat levels distinguished (in the ascending order)	Description of the lowest threat level	Description of the highest threat level	Institution responsible for a change in the threat level
UK	5	Words	Low Moderate Substantial Severe Critical	An attack is unlikely	An attack is expected imminently	The Joint Terrorism Analysis Centre, created in 2003 as the UK's centre for the analysis and assessment of the level and nature of the threat from international terrorism, is responsible for setting international terrorism threat levels and Ministers are informed of its decision. The Security Service is responsible for setting the threat levels from Irish and other domestic terrorism both in Northern Ireland and Great Britain.
COM	5	Numbers for threat levels and colours for alerts	1 (low threat) 2 (moderate threat) 3 (significant threat) 4 (high threat) 5 (critical threat). In addition to the threat levels there are 4 alerts graded into different colours according to their severity: white, yellow, orange and red.	Available intelligence and recent events indicate that terrorists currently have little capability and/or no intent to mount an attack on COM interests. It is assessed that an attack is unlikely to be mounted, although an attack cannot be ruled out.	Credible intelligence indicates that terrorists with an established capability are actively planning to attack Commission interests in the near future. An attack is expected imminently.	The terrorism threat level is constantly monitored and assessed by the Security Directorate of the Directorate General Human Resources and Security