ISSUE BRIEF

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EUROPE'S OWN ARTICLE 4: ADDRESSING EUROPE'S CHANGING SECURITY ENVIRONMENT

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(Views expressed in the brief are those of the author, and do not represent those of ISSI)



Delivering her annual State of the Union address in Strasbourg, European Commission President Ursula von der Leyen called for a "counter-hybrid playbook" and "Europe's own Article 4" as part of the new European Security Strategy. According to the President, Europe has entered an evolving hybrid-threat environment that requires urgent European preparedness. While the European Union (EU) and the North Atlantic Treaty Organisation (NATO) already have tools to respond to non-conventional threats, she argued their systems were built for a different world.[1] This issue brief compares existing European mechanisms for addressing security threats and investigates the institutional gaps that Europe's own Article 4 is intended to fill.

Comparison of Existing and Proposed Mechanisms

Following the developments surrounding Crimea in 2014, and particularly the escalation of the Russia-Ukraine conflict in 2022, European institutions and governments have increasingly reported a range of incidents they classify as hybrid activities, including espionage, arson, and drone-related incidents.[2]

1 European External Action Service, "2026 State of the Union Address by President von der Leyen," September 16, 2026, https://www.eeas.europa.eu/delegations/ukraine/2026-state-union-address-president-von-der-leyen_en

2 Linda Tóthová and Darius Engel, *EU Response to Hybrid Threats*, European Parliamentary Research Service, July 2026, PE 789.374

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These reported grey-zone activities have contributed to a more complex European security environment, with several EU and NATO member states recording incidents below the threshold of armed conflict. In response, European institutions have continued developing a multidimensional framework to address such activities. Recent incidents reported in 2026, including drone incursions in Poland, drones detected near Romanian energy facilities, an armed drone at Leipzig airport in Germany, and an unmanned aircraft entering Lithuanian airspace, have further prompted debate over the adequacy and effectiveness of existing security mechanisms.[3]

Within Europe's existing security architecture, the European Union has Article 42(7) TEU, Article 222 TFEU, and the EU Hybrid Toolbox. NATO member states can also invoke Article 4 for political consultation and Article 5 for the collective defence against an attack on any one member.

This table compares the existing mechanisms and highlights their key limitations.

Mechanism	Primary Purpose	Trigger/ Threshold	Who activates it?	Response	Limitations
NATO Article 4[4]	Consultation and formation of a joint decision.	The territorial integrity, political independence or security is threatened.	Any NATO member can invoke it.	Consultation may lead to a joint decision or collective response.	Excludes non-NATO EU members; includes non-EU allies; consultative; no obligation to respond.
NATO Article 5[5]	Collective Defence	An armed attack against one NATO member.	Any NATO member under attack.	Members may take necessary action, including armed force.	High threshold; No definite response.

[3] Brendan Cole, "Europe on High Alert as Russia Sows Panic with Hybrid Attacks," *Newsweek*, September 18, 2026, https://www.newsweek.com/europe-on-high-alert-as-russia-sows-panic-with-hybrid-attacks-12460081; Claudi Pérez, "The Escalating Threats on Europe's Borders," *El País*, September 12, 2026, https://english.elpais.com/international/2026-09-12/the-escalating-threats-on-europes-borders.html

[4] NATO, "The Consultation Process and Article 4," September 23, 2025, https://www.nato.int/en/what-we-do/introduction-to-nato/the-consultation-process-and-article-4

[5] NATO, "Collective Defence and Article 5," November 12, 2025, https://www.nato.int/en/what-we-do/introduction-to-nato/collective-defence-and-article-5

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Mechanism	Primary Purpose	Trigger/ Threshold	Who activates it?	Response	Limitations
The EU Article 42(7) TEU[6]	Mutual Assistance	Armed Aggression	EU member state victim of an armed aggression.	Assistance from member states, including technical, medical, civilian or military aid.	Limited to armed aggression.
The EU Article 222 of TFEU[7]	Solidarity to mobilise all the instruments to the affected state.	A terrorist attack, or a natural or man-made disaster.	Political authorities of the EU member state victim of the attack/ disaster.	The EU members provide aid to the affected state.	Not general-purpose mechanism; has certain conditions[8]
The EU Hybrid Toolbox[9]	Identify hybrid campaigns and coordinate Member States response.	Hybrid Activity	Member States can bring issues to the Council.	Preventive, cooperative, stability-building, restrictive, and supportive measures.	Coordinating and consultative. No binding obligation on all member states.
Europe's own Article 4 (to be defined)	Coordinate a European response to deter escalation/mitigate the impact.	Activities below the threshold of armed aggression that threaten national security.	Any one member of the EU	Not finalized but under development	Not Defined

Source: Author's compilation based on official NATO and EU sources cited in the table footnotes.

6 European External Action Service, "Article 42(7) TEU - The EU's Mutual Assistance Clause," October 6, 2022, https://www.eeas.europa.eu/eeas/article-427-teu-eus-mutual-assistance-clause_en

7 European Union, "Article 222," *Treaty on the Functioning of the European Union*, EUR-Lex, June 7, 2016, https://eur-lex.europa.eu/eli/treaty/tfeu_2012/art_222/oj/eng

8 Anna-Maria Osula, "EU Solidarity Clause and 'Cyber Disaster,'" *NATO Cooperative Cyber Defence Centre of Excellence*, https://ccdcoe.org/incyder-articles/eu-solidarity-clause-and-cyber-disaster/

9 European External Action Service, "Countering Hybrid Threats," March 19, 2026, https://www.eeas.europa.eu/eeas/eu-action-countering-hybrid-threats_en

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Analysis of the Proposed European Article 4

The EU and NATO already have security instruments and mechanisms. The analysis therefore examines the institutional gap that "Europe's own Article 4" can address. However, the protocol has not yet been finalised and is under development; therefore, the following analysis is based on the remarks made by High Representative Kaja Kallas and Commission President Ursula von der Leyen.

- **Membership and Response Instruments**

The head of the European Commission describes Europe's own Article 4 as "When triggered by one member state, all member states should convene to coordinate a European response to deter further escalation and to mitigate the impact."[10] Although NATO's Article 4 also allows members to coordinate when their security is threatened, it does not apply to European states that are not members of NATO. The EU and NATO share 23 member states, while Austria, Cyprus, Ireland, and Malta are outside NATO. Since the EU includes non-NATO members and NATO includes non-EU allies, this suggests a potential need for an EU-level mechanism with a defined threshold and response procedures for threats that fall below the threshold of armed aggression.

High Representative Kaja Kallas stated that NATO Article 4 is not an action plan.[11] This implies that it does not trigger a specific response. Furthermore, responding to a question about the proposed "Europe's own Article 4," she argued that it would focus on determining which tools to use in response to such threats.[12] Kallas added that the protocol must include a set of ready-to-deploy response tools.[13] Therefore, Europe's own Article 4 may define the tools and mechanisms that can be invoked in response to a predefined threat.

- **Speed of Response**

Most existing EU mechanisms, such as the Hybrid Toolbox, follow an assessment and coordination process before determining any response. However, Europe's own Article 4 was also referred to as an

10 European External Action Service, "2026 State of the Union Address by President von der Leyen," September 16, 2026, https://www.eeas.europa.eu/delegations/ukraine/2026-state-union-address-president-von-der-leyen_en

11 European External Action Service, "Foreign Affairs Council (Defence): Press Conference by High Representative Kaja Kallas," September 28, 2026, https://www.eeas.europa.eu/eeas/foreign-affairs-council-defence-press-conference-high-representative-and-vice-president-kaja-kallas_en

12 European External Action Service, "Foreign Affairs Council (Defence): Press Conference by High Representative Kaja Kallas," September 28, 2026, https://www.eeas.europa.eu/eeas/foreign-affairs-council-defence-press-conference-high-representative-and-vice-president-kaja-kallas_en

13 European External Action Service, "Foreign Affairs Council: Press Conference by High Representative Kaja Kallas," October 12, 2026, https://www.eeas.europa.eu/eeas/foreign-affairs-council-press-conference-high-representative-kaja-kallas-5_en

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"Emergency Security Protocol" by the President.[14] Moreover, Kallas stated that the EU needs a mechanism to consult and act rapidly, referring to the Emergency Security Protocol.[15] This suggests the protocol could streamline procedures for an expedited response to hybrid activity that reaches the prescribed activation threshold.

- **Defining the Threshold**

During her address in Strasbourg, the President stated that "hybrid threats are less and less hybrid"[16] implying that they are blurring the line between hybrid activity and armed aggression. According to Kaja Kallas, "The emergency protocol is rather which tools can be used at the moment for aggression that is not armed aggression that is under the threshold of Article 5."[17] To define the tools, the proposal must establish the thresholds at which an incident should trigger the protocol.

Policy Recommendations

As the EU considers introducing Europe's own Article 4 to respond to reported hybrid incidents in Europe, the following recommendations can be considered:

1. Europe's own Article 4, also known as the Emergency Security Protocol, should clearly define the activation threshold for hybrid activities below the threshold of armed aggression that require EU-level coordination. It should specify consultation and decision-making procedures, and response tools available for different incidents. Moreover, it should clarify how it would operate alongside the existing EU mechanisms while ensuring coordination and complementarity with relevant NATO mechanisms.

2. This protocol should include the tools that can be drawn upon to respond to a particular incident based on its nature and severity.

[14] European External Action Service, "2026 State of the Union Address by President von der Leyen," September 16, 2026, https://www.eeas.europa.eu/delegations/ukraine/2026-state-union-address-president-von-der-leyen_en

[15] European External Action Service, "Foreign Affairs Council: Press Conference by High Representative Kaja Kallas," October 12, 2026, https://www.eeas.europa.eu/eeas/foreign-affairs-council-press-conference-high-representative-kaja-kallas-5_en

[16] European External Action Service, "2026 State of the Union Address by President von der Leyen," September 16, 2026, https://www.eeas.europa.eu/delegations/ukraine/2026-state-union-address-president-von-der-leyen_en

[17] European External Action Service, "Foreign Affairs Council (Defence): Press Conference by High Representative Kaja Kallas," September 28, 2026, https://www.eeas.europa.eu/eeas/foreign-affairs-council-defence-press-conference-high-representative-and-vice-president-kaja-kallas_en

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3. Given its emergency character, the protocol should establish expedited processes for joint consultation, decision-making, and coordination of a collective response.

4. It should complement NATO's Article 4 but not duplicate the existing protocols of the EU and NATO.

Conclusion

European institutions increasingly identify hybrid threats as a significant security challenge and are seeking to address them through the proposed Europe's own Article 4. By comparing existing EU and NATO security mechanisms, the analysis finds that current arrangements provide different forms of consultation, mutual assistance, solidarity measures, and responses to a wide range of security challenges. However, current arrangements do not provide a single dedicated EU-wide emergency consultation mechanism for below-threshold hybrid threats with clearly defined activation thresholds, pre-agreed procedures, and response options.

Based on the analysis and official statements of the High Representative and Commission President, while the EU's existing security architecture includes broader crisis-management mechanisms, there is scope to establish a dedicated EU-wide emergency consultation protocol for below-threshold hybrid activities. Such a protocol could define activation thresholds and procedures for a collective response while ensuring applicability to all EU member states, including non-NATO members.

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