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COMMISSION STAFF WORKING DOCUMENT

on Military Mobility

Accompanying the document

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

on establishing a framework of measures to facilitate the transport of military equipment, goods and personnel across the Union

{COM(2025) 847 final}

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Glossary

Term or acronym	Meaning or definition
ASAP	Act in Support of Ammunition Production
BCP(s)	Border control post(s)
CARD	Coordinated Annual Review on Defence (Report)
CBMP	Cross-border movement permission procedures
CDP	Capability Development Plan
CEF	Connecting Europe Facility
CER	Critical Entities Resilience (Directive)
CINEA	European Climate, Infrastructure and Environment Executive Agency
CSDP	Common Security and Defence Policy
DG DEFIS	Directorate-General for Defence Industry and Space
DG MOVE	Directorate-General for Mobility and Transport
DG TAXUD	Directorate-General for Taxation and Customs Union
DTIB	Defence Technological and Industrial Base
EDA	European Defence Agency
EDEM	European Defence Equipment Market
EDF	European Defence Fund
EDIP	European Defence Industry Programme
EDIRPA	European Defence Industry Reinforcement through Common Procurement Act
EDIS	European Defence Industrial Strategy
EEAS	European External Action Service
EIB	European Investment Bank
EMERS	European Military Mobility Enhanced Response System
EPRS	European Parliament Research Service

ERA	European Union Agency for Railways
ERDF	European Regional Development Fund
ESF+	European Social Fund Plus
ESG	Environmental, Social, and Governance
ESOCA	European System for Outsized Cargo Airlift
EU	European Union
EUCO	European Council
EUMC	European Union Military Committee
EUMS	European Union Military Staff
GDP	Gross Domestic Product
G2G	Government-to-Government
HNS	Host Nation Support
JRC	Joint Research Centre
JSEC	(NATO's) Joint Support and Enabling Command
MFF	Multi-Annual Financial Framework
NATO	North Atlantic Treaty Organization
NIS	Network and Information Security (Directive)
PESCO	Permanent Structured Cooperation
R&D	Research and Development
R&D&I	Research and Development and Innovation
RSN	Reinforcement and Sustainment Network (NATO)
SATOC	Strategic Air Transport for Outsized Cargo
SEAP	Structure for European Armament Programme
SDMMS	Secure Digital Military Mobility System (project)
SESI	(EIB's) Strategic European Security Initiative
SME	Small and Medium Enterprise

SOFA	(NATO) Status of Forces Agreement
SWD	Staff Working Document
TAs	Technical Arrangements
TEN-T	Trans-European Transport Network
TFEU	Treaty on the Functioning of the European Union
UA	Ukraine
UAF	Ukrainian Armed Forces
UAV	Unmanned Air Vehicle
UCC	Union Customs Code
UCPM+	Union Civil Protection Mechanism Plus
UN	United Nations
US	United States

PURPOSE OF THIS STAFF WORKING DOCUMENT

The present Staff Working Document (SWD) serves to provide the analytical underpinning for the **2025 Military Mobility Package** consisting of the Joint Communication on Military Mobility and a Regulation on establishing a framework of measures to facilitate the transport of military equipment, goods and personnel across the Union . The purpose of this Staff Working Document is threefold: first, to clearly set out the **political and legal context in which EU action is taking place**; second, to identify the **core problems** and underlying **problem drivers** that continue to hinder military mobility despite progress achieved since 2018; and third, to present the **policy options** and analyse the preferred policy option to address these challenges, in line with the EU's competences and in full complementarity with efforts undertaken by Member States in other frameworks and in alignment with NATO, while building on existing achievements in this domain.

This Staff Working Document explains the urgent need to frame military mobility within the broader strategic debate on European defence-readiness, as highlighted in the **Strategic Compass of 2022** and the **Joint White Paper on European Defence-Readiness 2030**[1]. It must also be addressed in the context of a transport system which is inherently dual use and closely regulated at EU level. In particular, the SWD seeks to explain the rationale for EU-level intervention, to demonstrate the EU's capacity to bring added value through its regulatory, budgetary, and coordinating actions, and to prepare the ground for the adoption of the Military Mobility Package itself. In doing so, the document also fulfils the Better Regulation requirement to ensure that new proposals are supported by a structured analysis of the problems, objectives, and options available, while recognising that the urgency of the security context may preclude the preparation of a full impact assessment.

The Staff Working Document explains why the EU must act now to reinforce military mobility as a strategic enabler of European security and defence. By consolidating the evidence base submitted through a dedicated targeted stakeholder consultation and call for evidence, this SWD provides the **foundation for the policy option** designed to address these shortcomings in a comprehensive and systemic manner. In particular, the document articulates the need for a whole-of-government and whole-of-society approach, drawing together all relevant actors across sectors and levels of governance.

[1] European Commission, High Representative of the European Union for Foreign Affairs and Security Policy, "White Paper for European Defence – Readiness 2030", dated March 2025".

1 INTRODUCTION: POLITICAL AND LEGAL CONTEXT

1.1 The importance and definition of military mobility

The strategic context for the European Union and its Member States has changed profoundly since 2014, and particularly since Russia's full-scale invasion of Ukraine in February 2022. This act of aggression, in flagrant violation of international law and the principles of the United Nations Charter, has destabilised the European security order and brought high-intensity war back to the European continent. The risk of further Russian aggression, including against EU Member States, remains serious. The EU and its Member States must therefore prepare for the most extreme military contingencies.

Military mobility refers to the **ability of Member States' armed forces to move personnel, equipment, assets and supplies rapidly and seamlessly into, within and beyond EU territory**, by land, air, and sea.[2]

Military mobility is an essential element of the EU's wider security and defence policy. It enables the EU and its Member States to respond to the most demanding scenarios, ranging from large-scale collective defence contingencies to crisis management operations and support for partners such as Ukraine. It is also a **cornerstone of EU–NATO cooperation**, recognised by both organisations as a flagship area where EU action delivers concrete added value to the Alliance's deterrence and defence posture. The prospect of hostile action against EU Member States, including hybrid operations and conventional military action, cannot be excluded. In this context, the ability of the EU and its Member States to react rapidly and decisively has become a matter of strategic urgency.

While the Eastern flank requires particular attention in terms of deterrence and defence, comprehensive approach to military mobility with a "*360-degree approach*" is needed to ensure the ability of Member States to move forces swiftly across multiple theatres.

Military mobility encompasses <u>three interdependent dimensions</u>:

- **Regulatory:** processes and procedures for cross-border movement permissions, diplomatic clearances, customs formalities and route planning (especially for the transport of dangerous goods and oversized vehicles) which provide clarity and allow for speed in handling.
- **Infrastructure:** transport networks (railways, inland waterways, short sea shipping routes and roads linking maritime and inland ports, air transport infrastructure and terminals) adapted to dual-use needs, including airspace, load-bearing capacity, clearance height, and resilience to hybrid and cyber threats.
- **Capabilities:** availability of military mobility capabilities including particularly transport assets (e.g. abnormal load and dangerous goods transportation, specialised road vehicles, rail flatbeds, outsized cargo aircraft, roll-on/roll-off shipping, strategic lift capacity) to execute movement at scale and speed.

[2] European Commission and High Representative of the Union for Foreign Affairs and Security Policy, Joint Report to the European Parliament and the Council on the implementation of the Action Plan on Military Mobility 2.0, 20.3.2025.

Today barriers in all the above dimensions hamper military mobility and leaves the EU and its Member States exposed to insufficient readiness in crises, when time is critical for efficient deterrence and response.

1.2 Political commitments and achievements to date

Since 2017, the EU has pursued a dedicated agenda to strengthen military mobility. The **Joint Action Plan on Military Mobility of March 2018**[3], developed by the European Commission and the European External Action Service (EEAS) in cooperation with the European Defence Agency (EDA), identified 30 key actions across two pillars: (i) multimodal corridors and logistical hubs (identifying dual-use needs within the Trans-European Transport Network (TEN-T) and aligning EU infrastructure policy with military requirements), and (ii) regulatory support measures to reduce administrative barriers. Member States simultaneously adopted the first Military Mobility Pledge[4], committing to develop national implementation plans, establish networks of points of contact, and streamline cross-border procedures.

In November 2022, in response to Russia's renewed aggression against Ukraine, the Commission and the EEAS adopted the **Joint Communication on a new Action Plan on Military Mobility 2.0**[5], endorsed by the Council. Action Plan 2.0 expanded the scope of EU efforts to include resilience against hybrid and cyber threats, climate-proof and energy-secure infrastructure, and enhanced cooperation with NATO and key partners such as Ukraine, Moldova, and the Western Balkan region. The European Defence Industrial Strategy[6] from March 2024 urges further investment in military mobility to eliminate remaining movement bottlenecks.

The Strategic Compass for Security and Defence, adopted by the European Council in March 2022[7], explicitly recognised military mobility as a strategic priority. Military Mobility is also one of the priorities of the updated Capability Development Plan (CDP), as approved by Member States in November 2023[8]. The CDP highlighted the urgent need to substantially improve the military mobility of Member States Armed Forces. Furthermore, the Council Conclusions of May 2024[9] reaffirmed Member States' commitments through the **2024 Military Mobility Pledge**, which introduced a new level of ambition in terms of investment prioritisation and faster cross-border movement permissions.

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[3] European Commission and High Representative of the Union for Foreign Affairs and Security Policy, Joint Communication to the European Parliament and the Council on the Action Plan on Military Mobility, 28.3.2018.

[4] Council Conclusions on EU Security and Defence of 25 June 2018.

[5] European Commission and High Representative of the Union for Foreign Affairs and Security Policy, Joint Communication to the European Parliament and the Council on "Action plan on military mobility 2.0", 10.11.2022.

[6] European Commission and High Representative of the Union for Foreign Affairs and Security Policy, Joint Communication to the European parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on *"A new European Defence Industrial Strategy: Achieving EU readiness through a responsive and resilient European Defence Industry"*, 5.3.2024.

[7] European Council, *"A Strategic Compass for Security and Defence - For a European Union that protects its citizens, values and interests and contributes to international peace and security"*, 21.03.2022.

[8] European Defence Agency, "The 2023 EU Capability Development Priorities".

[9] Council Conclusions on EU Security and Defence, 27.03.2024.

Substantial progress has been recorded on military mobility across multiple frameworks. Researchers also point to the fact that the understanding of the underlying issues has increased as pointed to by Chihaia (2023) that the "understanding the importance of strengthening military mobility and political support have significantly increased across EU Member States since the start of the Russian war of aggression against Ukraine in 2022."[10]

With regards to addressing regulatory barriers, the **EDA** and Member States developed three Cross-Border Movement Permission Procedures (CBMP) Technical Arrangements (TAs) covering surface, air and maritime domains with the objective of harmonising and simplifying CBMPs. The Programme Arrangement for cross-border movement permissions was signed by 27 contributing Member States and Norway. The Technical Arrangements for Surface and Air have been signed by 26 and 25 contributing Member States respectively (including Norway). Recent updates to the Technical Arrangements Surface forms have further streamlined the process for obtaining annual diplomatic clearances. The Technical Arrangement for Sea is in an advanced state of negotiation and will also trigger an amendment of the Programme Arrangement. However, their implementation is suboptimal, and changes to the EU framework are necessary to achieve harmonization

Within **Permanent Structured Cooperation** (PESCO), projects Military Mobility and Logistical Hubs[11] have enabled cooperation on harmonising procedures and improving infrastructure planning. In 2023, EDA initiated consultations with the coordinating Member States of the two PESCO projects. European Commission and EDA developed a concept to create synergies between both projects, to highlight the gaps in and needs of logistics hubs along military corridors in Europe.

With regards to infrastructure, in the Multiannual Financial Framework (MFF) 2021-2027 a budget of approximately EUR 1.7 billion was designated to co-fund dual-use transport infrastructure through the **Connecting Europe Facility – Transport (CEF-T)**. Following the start of Russia's war of aggression against Ukraine, the Commission advanced the implementation of the budget ahead of the initial schedule – testifying to its determination to accelerate the development of dual-use transport infrastructure projects along the military and TEN-T networks. The full military mobility budget was eventually spent over a total of three calls for proposals (2021-2023), supporting 95 projects in 21 Member States, already showing results on the ground. The projects selected under the three calls cover all transport modes. More specifically, the projects will upgrade dual-use transport infrastructure in railways, roads, airports, maritime ports, inland waterways and multimodal terminals. Ultimately, the projects will contribute to the development of multi-modal transport routes connected by logistical hubs to handle also heavy and large-scale military transport at short notice – which is at the heart of military mobility.

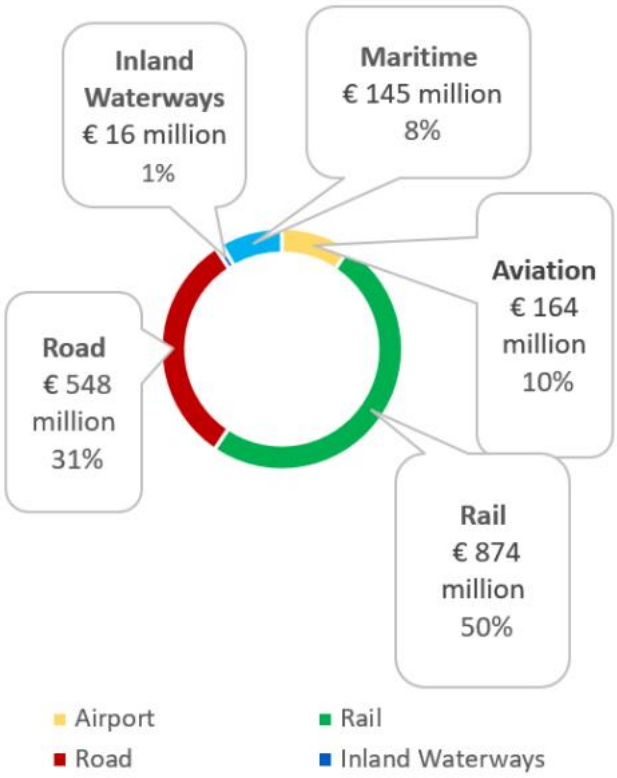
However, while important improvements to the military network have been realised with the first dedicated CEF military mobility funds, the investment possibilities have remained below the needs, with increasingly more funding demand from the Member States than could be accommodated. A notable example is the third call, which also exhausted the

10 Chihaia M.S., *"Advancing military mobility in Europe: An uphill battle"*, European Policy Centre, 11.4.2023.

11 PESCO Project "Network of Logistic Hubs in Europe and Support to Operations".

military mobility envelope under CEF, when the demand for funding significantly exceeded the available resources, with a heavy oversubscription by a factor of 4.7.[12]

Figure 1: Connecting Europe Facility military mobility funding by transport mode



Note: following Commission Implementing Decision of 7.3.2024 on the selection of Military Mobility projects following the 2023 call for proposals for grants under the Connecting Europe Facility - Transport sector pursuant to Implementing Decision C(2023) 4886 and Decision C(2024) 1421 final. https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52025JC0011

In 2021, the European Commission presented its proposal to revise the **TEN-T Regulation**[13]**,** another significant achievement. In July 2022, the Commission presented an amended proposal reflecting the changed geopolitical situation.[14] Following negotiations between the Council and the European Parliament, the amended proposal was finally adopted in June 2024.[15] The Regulation contains four key elements to support military mobility into, within and beyond the EU:

[12] Commission Implementing Decision of 7.3.2024 on the selection of Military Mobility projects following the 2023 call for proposals for grants under the Connecting Europe Facility - Transport sector pursuant to Implementing Decision C(2023) 4886, { C(2024) 1421 final }.

[13] Proposal for a Regulation of the European Parliament and of the Council on Union guidelines for the development of the trans-European transport network (COM (2021) 812), dated 14.12.2021.

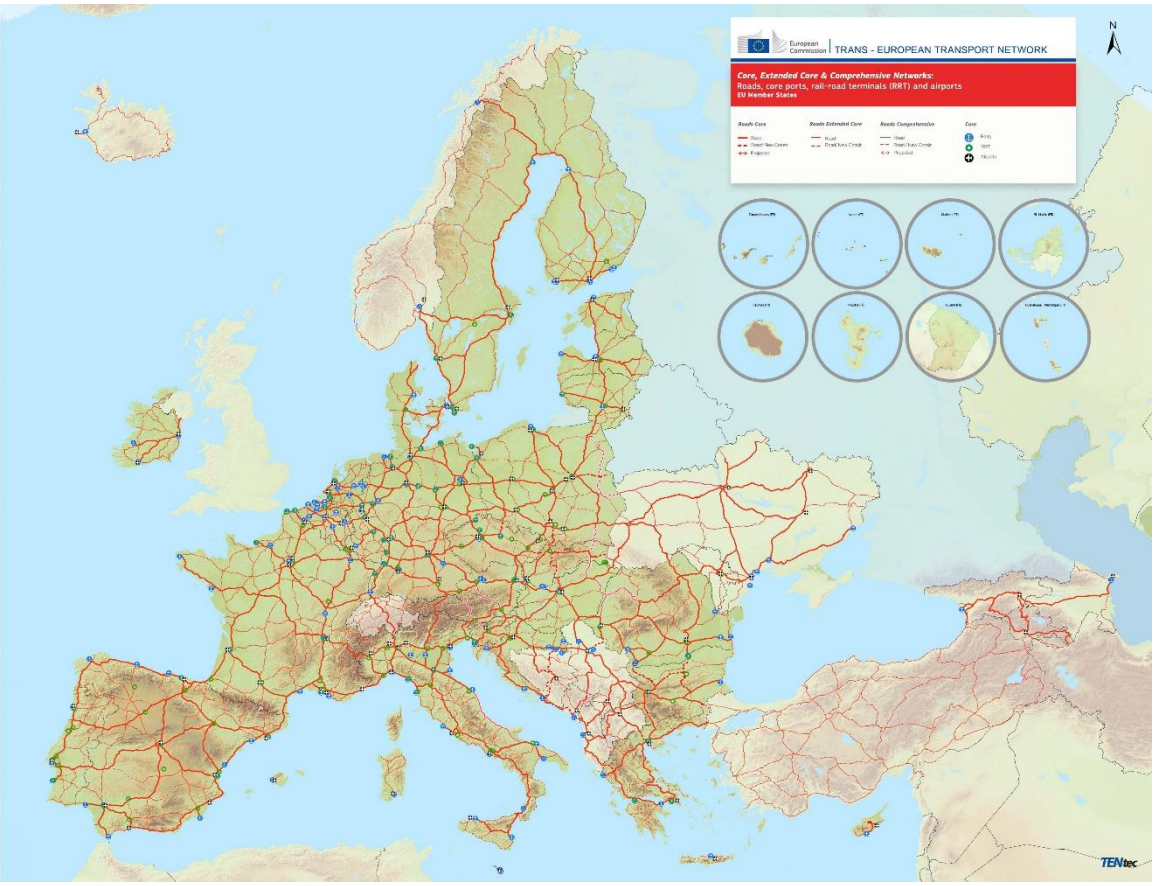
[14] Amended proposal for a Regulation of the European Parliament and of the Council on Union guidelines for the development of the trans-European transport network, amending Regulation (EU) 2021/1153 and Regulation (EU) No 913/2010 and repealing Regulation (EU) 1315/2013 (COM(2022) 384 final).

[15] Regulation (EU) 2024/1679 of the European Parliament and of the Council of 13 June 2024 on Union guidelines for the development of the trans-European transport network, amending Regulations (EU) 2021/1153 and (EU) No 913/2010 and repealing Regulation (EU) No 1315/2013 (Text with EEA relevance), OJ L, 2024/1679, 28.6.2024.

Firstly, it anchors within EU law the notion of a (dual-use) military mobility transport network; secondly, through its new Article 48 on military mobility, it mandates the Commission to identify possibilities for short-notice large-scale movements across EU, including priority military mobility corridors; thirdly, it sets the TEN-T on the path of becoming a largely dual-use transport infrastructure network, notably by requiring Member States to consider military mobility needs when constructing or upgrading infrastructure on the TEN-T; and fourthly, it strengthens and aligns several transport infrastructure requirements with Military Requirements, especially for rail, including the migration to European standard gauge (1435mm) in concerned Member States as a key military mobility enabler.

It also extends the TEN-T corridors to neighbouring countries, such as Ukraine, Moldova and Western Balkans partners. Four of the nine European Transport Corridors of the TEN-T already extend into Ukraine, with a first set of important investments ongoing by extending European standard gauge as important dual-use infrastructure enabler.

Figure 2: TEN-T EU Overview Maps - Mobility and Transport - European Commission (2024)



As announced in the Action Plan on Military Mobility 2.0, the Commission and EEAS, in close coordination with NATO's Joint Support and Enabling Command, identified **four Priority Military Mobility Corridors**, which were endorsed by the EU Military Committee (EUMC) in October 2024. These new priority corridors were included in the revised Annex II of the Military Requirements, which were adopted by the Council on 17 March 2025. The corridors will better guide and prioritise future investments in the military mobility network at both EU and national levels. This will also serve as a stable basis for

the EU to identify and prioritise dual-use projects with a high added-value and maturity for defence. In addition, the **EIB's Strategic European Security Initiative (SESI)** might play a crucial role in short-term investments for Member States.

The **European Defence Fund** (EDF) has financed several projects on digital information exchange systems, outsized cargo airlift, and studies for future air systems. These initiatives contribute to addressing capability shortfalls relevant for military mobility but remain at an early developmental stage. The work of projects such as EDF's project Secure Digital Military Mobility System (SDMMS) stands out. The project is receiving EUR 9 million in funding from the EDF. Project SDMMS stands to be "a comprehensive digital solution facilitating the exchange of information on military mobility in an efficient, secure and timely manner (during peacetime)."[16] The system facilitates direct and secure exchange of information between nations requesting and approving the mobility of military units, personnel, equipment, and supplies.[17]

These initiatives also reflect the recommendations of the 2024 **Coordinated Annual Review on Defence (CARD)** report, which points at the need for Member States to "align national planning timelines and develop multinational defence projects, in areas like military mobility, strategic enablers and force multipliers."[18]

Military mobility has also been consistently recognised in Joint Declarations on **EU–NATO cooperation** (2016[19], 2018[20], 2023[21]) as a "flagship area". NATO has repeatedly called for progress in this field to support alliance defence planning and reinforcement concepts.[22] Convened bi-annually, the **EU-NATO Structured Dialogue on Military Mobility** provides effective framework to exchange on the latest developments and to explore areas of further cooperation, with a view to ensuring coherence and mutual reinforcement.

1.3 Stakeholder consultation on Military Mobility

To collect qualitative and quantitative data and feedback on key issues that ought to be addressed in the Military Mobility Package 2025 a **targeted stakeholder consultation for the Military Mobility package** was conducted to. Launched on 12 June 2025 by the European Commission and the High Representative, it addressed Member States and all relevant actors including NATO, relevant PESCO projects, military mobility areas, industry, transport infrastructure and assets managers, customs and energy sector stakeholders and the financial sector among others. This targeted stakeholder consultation encompassed a dedicated online survey and possibility to submit position papers and

[16] EDF 2021 Project SDMMS factsheet.
[17] Project Secure Digital Military Mobility System (SDMMS)
[18] European Defence Agency, "Coordinated Annual Review on Defence – Report 2024".
[19] Joint Declaration on EU-NATO Cooperation by the President of the European Council, the President of the European Commission, and the Secretary General of the North Atlantic Treaty Organization, 8.7.2016.
[20] Joint Declaration on EU-NATO Cooperation by the President of the European Council, the President of the European Commission, and the Secretary General of the North Atlantic Treaty Organization, 10.7.2018.
[21] Joint Declaration on EU-NATO Cooperation by the President of the European Council, the President of the European Commission, and the Secretary General of the North Atlantic Treaty Organization, 09.1.2023.
[22] Van Hoeymissen S. *'Dual Use and Military Mobility Seminar Report: Fast-tracking Military Mobility'*, Royal Higher Institute for Defence, 26 April 2024.

written contributions until 31 July 2025. The EEAS and the European Commission also conducted a dedicated consultation of Member States until 30 September 2025.

In total, the Commission received **107 contributions** to the survey, of which 39 from Member States and 2 from Norway, 36 from companies, 12 from industry associations, 4 from other organisations. Other contributions included 12 from port authorities, 1 from rail authority and 1 representing workers. With regards to sectors represented, where possible to provide a specific allocation, 6 originated from air sector, 3 representing customs authorities, 1 from energy sector, 21 from rail sector, 2 from road sector and 18 from sea domain.

76 position papers were also received in the consultation, 7 from Member States and 69 from industry, think tanks, and other organisations. Input was also received from NATO.

The bilateral meetings with the Member States who responded positively to the invitation provided an opportunity to further discuss and deepen the understanding of the written contributions provided and present the aggregate results of the stakeholder survey to Member States. In addition to the structured consultation process, the Commission and the EEAS met bilaterally with those Member States who wished to avail of the opportunity further discuss each of the thematic areas. The bilateral meetings took place in September 2025 and were organised by the European External Action Service.

The results of the targeted stakeholder consultation are presented in the Annex.

2 PROBLEM DEFINITION AND PROBLEM DRIVERS

Despite political attention and progress achieved since the adoption of the Action Plans, the EU continues to face a persistent and systemic overarching problem: barriers to movement continue to exist, hindering a guarantee of seamless military movements across its territory under operationally relevant timelines.

This chapter provides a structured analysis of the problems and their drivers. It builds on stakeholder input and bibliographical evidence.

The EU's approach to military mobility remains fragmented and insufficiently binding, calling for more robust EU-level action to overcome persistent bottlenecks. In broad terms, remaining barriers exist in the following areas:

- **Regulatory and administrative barriers:** cross-border movement permissions procedures remain lengthy and divergent across Member States, in particular as EU rules are not applied consistently and coherently and do not always apply to military transport, national regulations diverge, and military transport is not given sufficient priority. Additionally, military transport operations have far more demanding requirements than civilian ones. The lack of binding EU-wide procedures hampers predictability and speed. In relation to customs formalities, insufficient use of the EU/NATO form 302 for customs formalities is also considered to be an avoidable obstacle. Lack of digitalisation of cross-border permissions remains an obstacle increasing the time to handle permissions and the risk of errors in the completion of the forms 302.

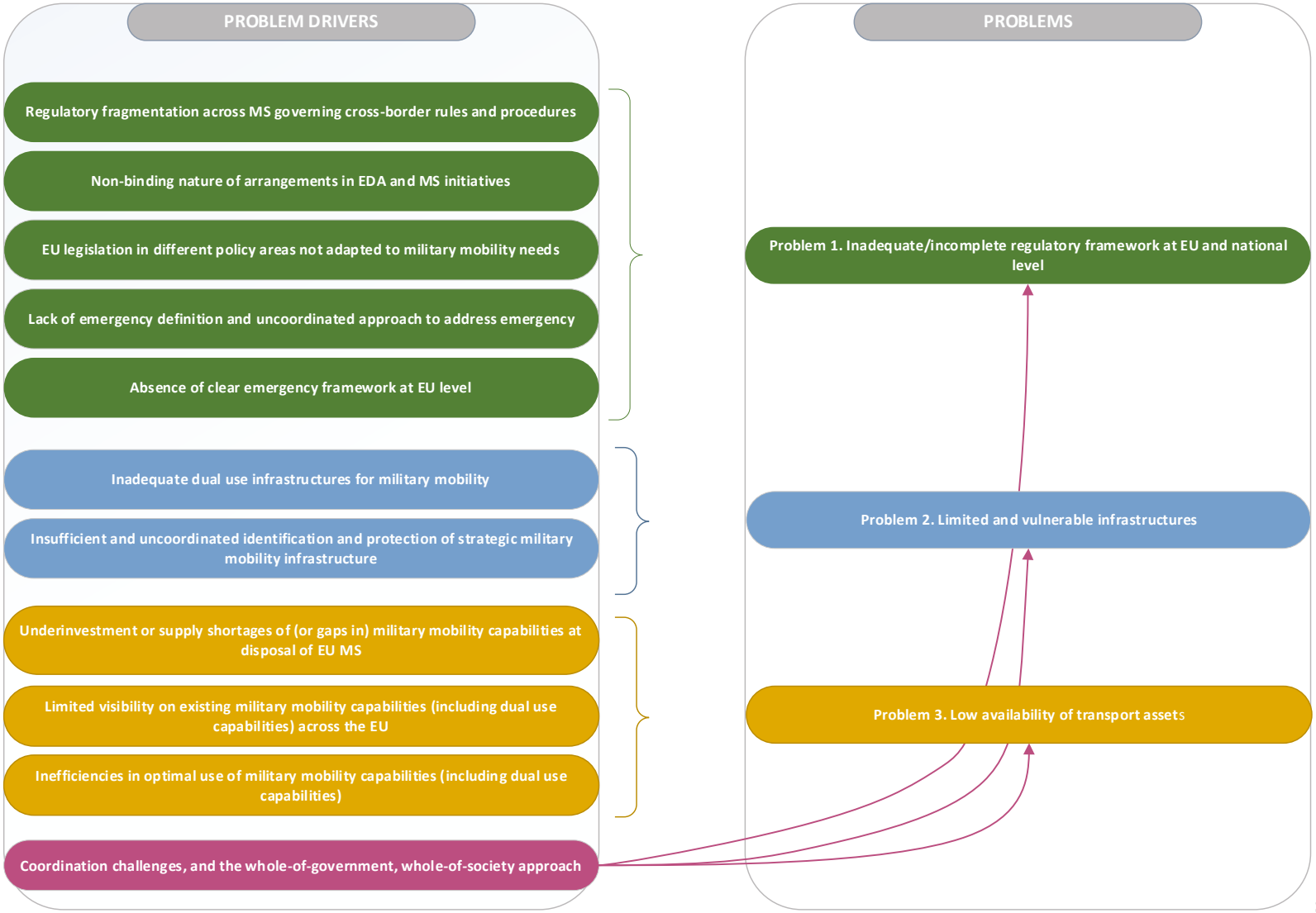
- **Infrastructure problems:** critical gaps persist in dual-use transport infrastructure, particularly along the agreed military corridors. Available funding remains below the level required to meet identified needs, with load-bearing requirements not being met; ports, airports, and rail hubs requiring adaptation for outsized military equipment; airports and airspace management systems not compliant with military requirements. Resilience of dual use infrastructure against all types of threats including cyber and hybrid remains insufficient.

- **Capability shortfalls:** limitations in strategic transport assets (air, rail, sea), rail flatbed availability, and inland waterway transport assets constrain operational readiness. Availability of existing assets is not always guaranteed, alongside with a limited availability of existing commercial assets for military use. An absence of pooling or pre-contracting mechanisms at EU-level also persists, and there is no mechanism providing oversight at EU level of civilian assets with potential dual use.

- **Coordination challenges and the need for a whole-of-government, whole-of-society approach.** The challenges posed by military mobility cannot be addressed by defence or transport actors, or by individual Member States, alone and there is a need for cross-sectoral coordination among the relevant authorities as much as possible, in and among the Member States and in wider context. The current approach shows its limitations with the relatively low level of implementation of the Technical Arrangements.

The correlation between (i) the causes (problem drivers) and main problems; and (ii) problems, objectives and measures is presented in the two problem trees below.

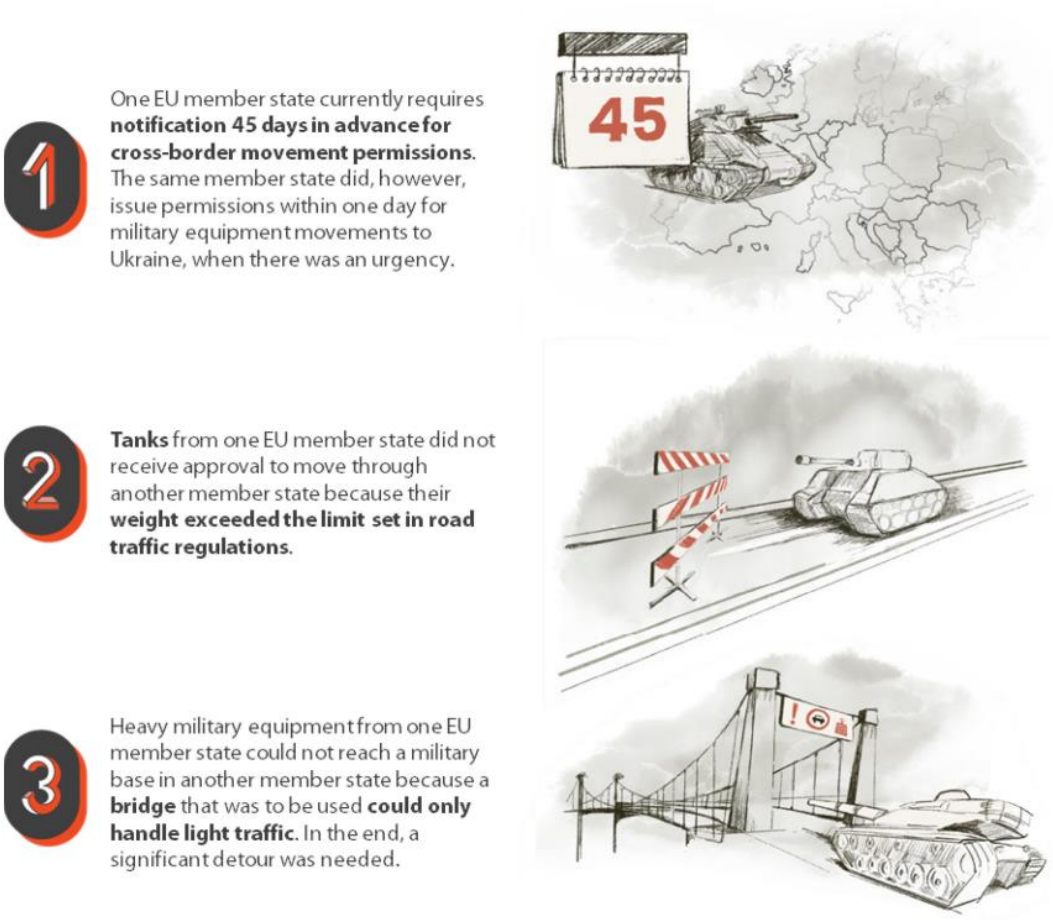
Figure 3: Problem tree for the 2025 Military Mobility Package – Relation between problem drivers and problems



Source: European Commission

As detailed above, the identified problems are not confined to a single sector but result from the interaction of multiple structural drivers. Divergent and complex regulatory requirements, lengthy and unpredictable authorisation procedures, insufficiently adapted dual-use infrastructure, and limited availability of transport capabilities combine to create significant delays and uncertainty. The consequences are severe, as they undermine our ability providing credible European deterrence and defence, complicate EU-NATO cooperation, and weaken readiness in responding rapidly to crises and challenge the Union's ability in supporting Ukraine. The 2025 Special Report of the European Court of Auditors confirmed that progress remains incremental, voluntary measures have reached their limits, and national implementation is uneven.

Figure 4: "Examples of military mobility issues in the EU", taken from ECA Special Report 04/25, p. 7.



2.1 Inadequate/incomplete regulatory framework at EU and national level

The current framework governing the cross-border movement of military personnel and equipment within the European Union remains **fragmented, inconsistent, and largely national in character**.

Each Member State applies its own set of legal requirements, administrative procedures and approval timelines for granting movement permissions, issuing diplomatic clearances, and facilitating customs formalities. There are inadequacies in the existing framework dealing with the transport of military goods, particularly if dangerous or oversize. These

procedures often reflect institutional divisions between Ministries of Defence, Foreign Affairs, Transport and/or Interior. As a result, military transport across several Member States faces **multiple, unaligned systems, often requiring successive rather than parallel approvals.** This leads to redundant exchanges of information, duplicated documentation, and cumulative lead times that are incompatible with operational needs and realities on the field. The current fragmentation governing cross-border movement at national level significantly hampers the ability to move troops and equipment across the EU, especially in times of crises when quick and decisive reaction is needed ensuring credible deterrence and effective defence.

Existing alignment and coordination mechanisms among Member States, such as the EDA Technical Arrangements, have provided a voluntary framework but remain insufficient to deliver the level of coherence required for rapid military mobility. Although the majority of Member States have signed these arrangements, they are not legally binding and rely entirely on national commitment for their implementation. This **voluntary character has resulted in uneven application across the EU**. The Technical Arrangements set out a desired end-state but lack enforceable obligations, leaving Member States without the necessary tools or incentives to implement a genuine whole-of-government approach to military mobility. As a consequence, military transport across the EU operates under a patchwork of national practices and arrangements that fall short of providing the legal certainty and predictability needed for cross-border transport at scale and speed.

Lack of clarity and transparency in procedural requirements due to national differences, varied terminology and definitions between Member States complicate effective cross-border movement permissions process. Key terms such as “convoy”, “pre-notification timeframe” or “movement priority code” are not uniformly understood or applied. The procedures themselves are often opaque and fragmented across different administrative entities, leaving sending, transit and host Member States uncertain about the expected documentation, points of contact, and decision-making timelines. This **unpredictability** also affects civilian authorities and operators, who must manage the impact of military movements on civil transport networks, infrastructure, and safety systems. The **absence of standardised rules and digital tools** (or their limitations for the types of transport they cover when they do exist) hampers effective coordination between military and civilian actors, increases administrative burden, and risks operational delays during both routine and emergency movements. What is more, civilian transport regulatory frameworks often do not take into consideration military planning needs.

The cumulative effect of these shortcomings results in a system characterised by its **administrative complexity and limited relative responsiveness**. These inefficiencies also impose unnecessary administrative and financial costs on national authorities and reduce the credibility of the EU’s defence and deterrence posture. The inadequacy of the current regulatory environment manifests in **slow and unpredictable permission processes, duplication of administrative processes, and limited interoperability between and coordination of national systems**. It prevents the full exploitation of synergies between military and civilian transport networks and weakens the EU’s ability to act quickly and effectively in a crisis.

2.1.1 Regulatory fragmentation across Member States governing cross-border rules and procedures

While this challenge is clearly recognised in the *Military Mobility Action Plan 2.0*, **regulatory barriers remain a major obstacle** to swift, efficient, and unimpeded movement of troops and equipment across and beyond the EU. At EU-level, extensive work at technical and regulatory level has been carried out over the decades, especially when it comes to harmonisation. The relevant procedures that are now apt for civilian needs will have to reflect the realities of defence-readiness.

Although progress has been achieved through initiatives such as PESCO and EDA projects, the stakeholder consultation results confirm that **cross-border rules and procedures continue to be fragmented, slow, and insufficiently harmonised**. This decreases military mobility preparedness and the EU's overall defence readiness posture by seriously hampering time-to-movement capabilities and increasing response times.

Cross-border military consignments face strict administrative rules and procedures, especially for diplomatic clearances, national rules related to customs formalities and transporting dangerous or oversized cargo. These rules are often complex, paper-based, and not harmonised across Member States. Further, military transports increasingly use private operators subject to civilian transport rules, creating a complex situation with differing obligations for different operators. Additionally, approaches and procedures standardised in the context of NATO cooperation do not necessarily align with EU provisions, leading to the inefficient coexistence of slightly different processes. These barriers generate additional costs and, crucially, risk causing delays when prompt troop and equipment movement is essential.

Consultation respondents from **Member States** (76.92%) and **industry stakeholders** (58.33%) **identified customs clearances and movement permissions as critical bottlenecks**. These barriers are aggravated by divergent national rules for oversized cargo and dangerous goods. For example, in Germany, convoy movements require separate permissions from each Federal State (Laender), multiplying bureaucratic steps. Such fragmentation becomes particularly problematic in situations requiring large-scale deployments at short notice. The stakeholder consultation results further revealed that both Member States and industry see the lack of a common definition of "transport emergency" as a source of uncertainty.

Progress towards reducing fragmentation has been demonstrated in ***ad hoc* framework**s, such as the **NL-DE-PL (or NDP) corridor agreement** signed in January 2024, the first of six. By abolishing individual cross-border movement permissions and replacing them with standing authorisations, the participating countries significantly reduced administrative delays, enhancing preparedness and deterrence posture.[23] This 'model' corridor provides a tangible test case for closer alignment of rules and procedures. However, these six initiatives remain limited to *tri* and multilateral agreements and do not cover all EU Member States. **Several military mobility areas agreements have now been signed** (Italy-Albania-North Macedonia-Bulgaria-Romania; Greece-Bulgaria-Romania; Iceland-Norway-Sweden-Finland-Denmark; Italy-Slovenia-Croatia-Hungary;

[23] Hartmann, Jannik. "Military Mobility; Getting Germany's -Transportation Infrastructure Up to Speed", German Council on Foreign Relations.

Romania-Bulgaria-Türkiye). In addition, to date, none of the (voluntary) efforts to harmonise diplomatic clearances have taken into account the technical clearances or arrangements that are essential for a military transport to take place.

The **regulatory fragmentation across Member States** persists as a **major cause of delays and inefficiencies in military mobility**. The lack of harmonisation in permissions, documentation, and emergency procedures, combined with insufficient digitalisation, directly undermines the EU's capacity to enable rapid deployment.[24] The current framework remains, thus, overly reliant on national procedures, leading to systemic delays that reduce preparedness, deterrence, and the EU's credibility as a security actor.

2.1.2 Non-binding nature of arrangements in European Defence Agency and Member States' initiatives

Member States preserve the prerogative for allowing the passage of foreign troops and military materiel through their territories. To obtain the right of passage, foreign troops therefore need to obtain specific approvals from the 'host' nation. These are referred to as **diplomatic clearances for cross-border movement permissions**.

While in the past the processes for obtaining such diplomatic clearances differed widely among EU Member States, important **harmonisation work has been done** recently by the **European Defence Agency (EDA)**. Most notably, the forms used by Member States for requesting such cross-border movement permissions have been harmonised, but also the timelines for responding to such requests have been streamlined.

To this end, the EDA developed the aforementioned **Technical Arrangements**: one for movements over land (TA Surface), one for movements by air (TA Air), and one or movements by sea (TA Sea) and one for movements by air (TA Air). However, the use of these forms remains voluntary, and several Member States or regional authorities request additional forms in practice.

The Commission has been involved in the development of these Technical Arrangements, in relation to the rules relating to the transport of dangerous goods. The legal framework for the transport of dangerous goods by road, rail and inland waterways is **Directive 2008/68/EC**, which in turn transposes into EU law several international agreements on the subject, namely, for road transports the **'Agreement Concerning the International Carriage of Dangerous Goods by Road**' (ADR); for rail transport, it is the **Regulation concerning the International Carriage of Dangerous Goods by Rail** (RID), as well as dedicated technical specifications for infrastructure and rolling stock; for inland waterway transport, it is the **European Agreement Concerning the International Carriage of Dangerous Goods by Inland Waterways** (ADN). As far as air transport is concerned, European rules regarding the transport of dangerous goods can be found in **Commission Regulation (EU) No 965/2012 on Air Operations**[25]. This Regulation mandates

[24] CEPA Task Group, "The CEPA Military Mobility Project; moving mountains for Europe's defense", March 2021.

[25] Commission Regulation (EU) No 965/2012 of 5 October 2012 laying down technical requirements and administrative procedures related to air operations pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council, OJ L 296, 25.10.2012, p. 1.

compliance with ICAO Technical Instructions (Doc 9284) for the Safe Transport of Dangerous Goods by Air.

These international agreements, and consequently Directive 2008/68/EC, set rules **harmonising the procedures for the transport of dangerous goods across EU Member States**. However, transport performed under the orders or responsibility of military forces are excluded, although ammunition and fuels are classified as "dangerous goods". Such military transport therefore tends to require ad hoc national authorisations which creates uncertainties and delays. The Technical Arrangements try to remedy this situation by harmonising the rules and procedures for the transport of dangerous goods also in relation to transports that are performed under the orders or responsibility of military forces. Moreover, oversized or overweight transport is not included in the scope of the Technical Arrangements. The absence of military needs and requirements when it comes to dangerous goods' transport legislation also serves as a powerful driving force behind the need for EU-level legislative action.

The **'TA Sea'** for the maritime domain is in an advanced state of negotiation. Recent updates to the TA Surface forms have further streamlined the process for obtaining annual diplomatic. It will also trigger an amendment of the Programme Arrangement.

The progress in implementation of the signed TAs is monitored by the **EDA Implementation Monitoring Matrix**. The network of national point-of-contacts for military mobility provides feedback from the Member States.

Member States are also co-ordinating their national efforts on a strategic level through the **PESCO project on Military Mobility**. This has led to the establishment of a **National Point of Contact Network**, which plays a strong role in testing and using the Cross Border Movement Permission Technical Arrangements.

While substantial progress has been made in the EDA and PESCO frameworks, their **non-binding character represents a major structural weakness**. The achieved alignment is often hampered in the implementation phase, by lack of translation of the agreed objectives into national law, especially where they concern areas other than those falling into the remit of Ministries of Defence.

Despite repeated pledges, including the *2024 Military Mobility Pledge* and the *Action Plan on Military Mobility 2.0*, **Member States' political commitments have not been matched by coherent implementation or systematic reporting**. Consultation data confirm persistent bottlenecks: 64.1% of respondents from Member States and 70.83% from industry cited infrastructure deficiencies, while 76.92% of respondents from Member States identified administrative procedures as a major obstacle, highlighting the gap between declarations and practice.

The European Court of Auditors likewise called for a more **focused prioritisation of EU funding** and the **improvement of selection of dual-use projects along strategic corridors**. Stakeholder consultation reflects this perception: national implementation remains fragmented, with 76.92% of respondents from Member States relying on ad-hoc coordination rather than whole-of-government structures, while EU-level reporting has not yet produced comparable data on readiness or time-to-movement. Weak follow-through

on political commitments, combined with insufficient monitoring, sustains capability gaps and undermines EU credibility on military mobility.

Overall, the reliance on non-binding arrangements leads to fragmented rules, procedural delays, and unnecessary administrative and financial costs. Most critically, it undermines operational readiness by slowing down the rapid, large-scale, and coordinated movement of forces and equipment across the EU.

2.1.3 EU legislation in different policy areas not adapted to military mobility needs

Military mobility also remains hindered by the **limited adaptation of EU legislation in relevant policy areas to the specific needs of armed forces**. Existing rules designed for civilian transport, trade, taxation and customs do not sufficiently address operational requirements of military movements in various scenarios. The armed forces also significantly depend on civilian operators for their military transport operations. This creates **legal uncertainty** and **systemic delays** when Member States attempt to reconcile civilian rules and obligations with urgent military transport demands.

Researchers point that "in this context, Europeans need to enhance their defence capabilities dramatically and become more self-reliant. Immediate priorities include […]**ensuring enablement**, including through **enhanced military mobility**. Further improvements here are vital, for example, it still takes about 60 days to transport an equipment convoy from a French military site to the Cincu training centre in Romania." [26] [27]

In the European transport network, infrastructure, assets and services are often shared between civilian and military users. This shared, and thus limited availability can lead to conflicting demands. Today, however, **rules on priority access** are either patchy or non-existent for most transport modes. There is no specific EU legislation granting priority access to maritime ports and their facilities. In the rail sector, while access rules for track and service facilities and arbitration processes are harmonised[28], existing legislation does not include derogations for military transports. In the aviation sector, Member States already have the possibility to restrict traffic rights for commercial aviation to deal with sudden problems of short duration resulting from unforeseeable and unavoidable circumstances, but this is limited to a maximum of 14 days at a time and procedures to renew such emergency measures can be burdensome.[29] As a result, military transports may face delays when competing with civilian traffic for the use of transport infrastructure in emergency situations.

In the Military Mobility Pledge of May 2024, Member States committed to "ensure a prioritised access of the armed forces to relevant transport modes, networks and assets, including required airspace, also through the EU regulatory framework, in support of national efforts, most notably in times of crisis and conflict and where possible already in peacetime, in full respect of the sovereignty of EU Member States over their national

[26] Chiahia, M., "Military Mobility, a critical enabler", European Policy Centre, June 2025.
[27] Elie Tenenbaum and Amélie Zima, "Return to the East: the Russian Threat and the French Pivot to Europe's Eastern Flank," IFRI, June 2024, p. 59.
[28] Directive 2012/34/EU of the European Parliament and of the Council of 21 November 2012 establishing a single European railway area and its implementing legislation.
[29] Regulation (EC) No 1008/2008.

territory and national decision-making processes regarding military movements. To this end, Member States should ensure the availability of the necessary capacity, *inter alia* through establishing strategic partnerships, including joint or national initiatives, notably framework contracts with the civilian transport providers."

This commitment was reflected in the Commission's proposal for a Rail Capacity Regulation (RCR). In relation to this proposal, which foresees priority access for military trains in times of crisis, Member States and industry expressed differing views on the possibility of extending such rules to other transport modes.

In addition to the limited implementation of the pledge to issue diplomatic clearances within 3 working days, cross-border rail movements are further hampered by the absence of parallel binding deadlines to allocate train paths for such transports, especially when a specific authorisation is required foran exceptional transport[30], which is currently not covered by harmonised European rules and thus subject to unharmonised national processes.

Consultation respondents from Member States (76.92%) and industry stakeholders (58.33%) identified **movement permissions and customs clearances** as sources of delay in military transport. These barriers are aggravated by divergent national rules for oversized cargo and military carriage of dangerous goods. For example, in Germany, convoy movements require separate permissions from each Federal State (*lander*), multiplying bureaucratic steps. A practical case illustrates this challenge: a convoy travelling from the Netherlands to Lithuania must obtain permissions from all transit countries (and transit sub-regions) individually, often resulting in significant delays. Such fragmentation becomes particularly problematic in situations requiring large-scale deployments at short notice.

As a result, military operators face delays when competing with civilian traffic for the use of critical infrastructure such as ports, rail hubs or airports. For air military mobility, the lack of predefined cross-border connections, covering the whole EU, prevents swifter military transport operations (i.e. for transport aircraft, fighters, drones, air to air refuelling) while it could minimize the impact of such operations on civilian traffic within the EU air traffic management network. In the area of unmanned aircraft systems, regulatory fragmentation hinders the effective use for dual-use transport. The current certification process for dual-use drones is fragmented, with national military authorities certifying drones in an un-coordinated manner, creating a risk of non-alignment with future civilian regulations. Moreover, there is currently no harmonised approach to the integration of drones in low altitude airspaces and U-space, which is a complex issue, requiring a joint framework for safe sharing of airspace between civil and military users.

The divergence of national rules is especially evident in the **transport of oversized and overweight cargo, and of dangerous goods** in the military domain. Despite some facilitation measures at EU level, consultation feedback shows that delays persist: 64.1%

[30] Exceptional transport is defined as 'a vehicle and/or the load carried which because of construction/design, dimensions or weight does not meet the parameters of the route and requires special authority for the movement and may require special conditions over part or its entire journey' in Commission Implementing Regulation (EU) 2019/773 of 16 May 2019 on the technical specification for interoperability relating to the operation and traffic management subsystem of the rail system within the European Union, OJ L 139I 27.5.2019, p. 5.

of Member States and 47.92% of industry stakeholders supported conditional relaxation or rules for dangerous goods transport, but only in wartime or crisis scenarios. This highlights both the operational importance of flexibility and the lack of a clear, harmonised legal mechanism to apply it.

In the context of the **Technical Arrangements on Cross Border Movement Permissions**, applicable to movements by road, rail, inland waterways, air and sea, the signing Member States agreed to **voluntarily apply the civil legislation on the transport of dangerous goods** by different transport modes to military transport. While this represented an important step forward, the voluntary nature of the Arrangements and the fact that many Member States still require additional formalities mean that there is still significant legal uncertainty for cross-border military consignments containing dangerous goods.

The Weights and Dimensions Directive regulates the issuing of authorisations by Member States for civil road transport of indivisible loads where cargo/vehicles exceed the limits set in the Directive, i.e. the maximum weight, length, width, or height for standard heavy-duty vehicles. Such transport may require a special permit issued by the competent authorities in each of the transited Member States. The authorities competent to issue these permits and the procedure to submit the request and obtain the permits are not harmonised. There can be a single national authority or several regional or local authorities, and there are variations in the documentation and information requested, its format (paper or digital), the conditions assigned to each type of permit (marking, escort, axle weights and spacing, etc), the type of permit issued (long-term permits vs one-time/one-route permits) and the time to obtain those permits (from 1-2 weeks to 12 weeks) depending on the Member State and their national rules.

As regards rail transport, when the dimensions/weight of the transported goods are outside the declared parameters of a line, such cargo transports can only be authorised under time consuming, manual route compatibility checks.

Military mobility is also affected by **rules on cabotage**, i.e. any road transport by a motor vehicle registered in a country performed on the national territory of another country. Current rules on civilian cabotage operations by road as laid down in Regulation (EC) No 1072/2009 impose restrictions on how long a road haulier from a different Member State can operate in another Member State. This is relevant for military transport insofar as the armed forces rely significantly on civilian operators. While military movements carried out by the armed forces themselves are already excluded from cabotage rules, civilian operations under the responsibility of the military are not. This means that cabotage restrictions might limit the operational flexibility of the military and create additional delays.

The **EU Form 302** and **NATO Form 302** are a facilitation of the regular **customs formalities** for the arrival, movement or use of goods for official military purposes. They therefore fall under the exemptions provided by the Union Customs Code (UCC) or the NATO Status of Forces Agreement (SOFA). However, the application of Form 302-based simplified formalities remains inconsistent across the EU, due to on the one hand the failure by economic operators to use this facilitation and, on the other hand, the lack of harmonised application by Member States' customs authorities of the Form 302. This

results in unpredictable delays, increased administrative burden, and a fragmentation of military logistics.

Formalities applicable at the border remain a source of systemic delays. Although customs facilitation measures have been introduced, 76.92% of Member States and 58.33% of industry stakeholders still identified **customs clearance as a major obstacle**. Current EU legislation does not provide sufficient mechanisms for further speeding up the treatment of the EU/NATO form 302 or for expedited procedures or waived requirements in emergency situations, leaving military movements vulnerable to delays due to customs or other non-fiscal legislation applicable at the border. A specific example concerns the import of **food supplies** for NATO troops stationed in the EU: existing rules include the obligation to control every consignment of certain goods entering the Union territory and do not provide for any exemption or facilitation during emergency situations. The lack of digitalisation of cross border permissions and customs formalities is an area stakeholders point to as an additional source of delays.

This is particularly true when it comes to **food imports**, especially on the alimentation of NATO/non-EU troops. All shipments of animals, food of animal origin and certain other foodstuffs and plant products must be presented at border control (the first entry point into the EU) posts (BCPs) to verify compliance with EU legislation relating in particular to public health, animal health and plant health. In times of an enhanced deterrence situation, these requirements can lead to delays that contradict the quick and seamless food supply of NATO/non-EU troops.

Military experts from Member States have developed, within the framework of EDA, the **military requirements for a Digital Military Customs System**. This document has been endorsed in the EDA Programme on Harmonising Military Requirements related to Customs by 25 Member States as well as Norway. Its content will be assessed against applicable customs legislation to determine how it can reinforce potential digitalisation.

Liquid **fuels** and in particular jet fuel will remain vital for military operations in the upcoming decades. This reliance on jet fuel will continue in the future given the lack of available alternative technologies for aviation. The energy transition has to be effectively managed without limiting military readiness and defence capabilities.

The EU has an interest in encouraging local production of **Sustainable Aviation Fuel** (SAF) to improve energy security. The **ReFuelEU** mandate for sustainable aviation fuel (SAF) uptake represents long-term trajectory to create a SAF EU market. In addition, the **Sustainable Transport Investment Plan** (November 2025) will be one of the key instruments to develop SAF production in the EU. However, it is unlikely that 100% of EU SAF consumption could be covered by EU production and Europe's current reliance on imports for fuels is expected to remain.

The Action Plan on Military Mobility 2.0, the Niinistö Report from 2024 and the White Paper for European Defence Readiness 2030 from 2025 highlight that Europe's military preparedness called for a more detailed consideration of fuel infrastructure, the challenges posed to fuel supply by war conditions, and the means by which deficiencies can be

addressed in a timely manner. Additionally, the NIS2 Directive[31] identifies **energy** as **one of eighteen critical sectors for which cybersecurity requirements apply.** Pursuant to the NIS2 Directive, the energy sector, includes oil production, storage and transmission pipelines, as well as electricity, district heating and cooling, gas and hydrogen subsectors.

Current transport and fuel supply infrastructure on the EU's eastern Flank and fuel connectivity between East and West is insufficient for a potential high-intensity conflict. The military fuel pipeline systems across European countries lack in geographical scope, especially within the main military corridors defined by Military Mobility Action Plan 2.0 towards the eastern flank.

The energy EU legal framework, such as **Directive 2009/119/EC** on **oil stocks**, has been designed around security of supply of the civil market, market efficiency and decarbonisation. It provides no harmonised provisions for ensuring access to fuel supplies by armed forces in times of crisis, this being left for national legislation. Consultation results show that 61.54% of Member States already report difficulties in ensuring sufficient access to fuel, particularly on the EU's eastern flank, with industry stakeholders raising concerns about insufficient refining capacity and supply chain vulnerabilities.

The aforementioned fuel supply vulnerabilities pose an acute strategic risk. The lack of reliable storage and pipeline connections along strategic corridors (particularly in eastern Europe) threatens to sever logistical chains in prolonged "transport crises". Dependence on shrinking refining capacity in Western Europe exposes the EU to external supply shocks at a time when resilience is most needed.

Digitalisation, while broadly supported as an enabler of harmonisation, remains underdeveloped. Although 69% of Member States and 47% of industries supported the establishment of a digital tool for cross-border permissions, concerns about cybersecurity, NATO compatibility, and fallback mechanisms persist. The absence of a binding, interoperable digital framework reinforces dependence on fragmented national systems, limiting the ability to accelerate prioritisation and permissions in emergencies.

Absence of harmonised digital systems and slow clearance processes compound very tangible, physical bottlenecks, leading to convoys facing unpredictable delays at borders, undermining coordination between Member States and NATO allies.

To characterise this specific problem driver: EU legislation in areas such as transport, customs, energy, and digitalisation does not adequately integrate military mobility requirements. The lack of harmonised prioritisation rules, unclear procedures for crisis situations, and absence of binding obligations (see referred problems with TAs) to ensure military access to critical infrastructure collectively undermine operational readiness, deterrence posture, and the EU's capacity to respond rapidly to emerging security threats.

A finding of the Seminar on Dual-Use Capabilities and Military Mobility hosted in February 2024 by the Belgian Presidency of the Council was that "information sharing is a challenge in military mobility both on the operational and strategic level. Differences in the classification cultures between NATO and the EU, as well as bilateral sensitivities

[31] Directive (EU) 2022/2555 of the European Parliament and of the Council on measures for a high common level of cybersecurity across the Union, amending Regulation (EU) No 910/2014 and Directive (EU) 2018/1972, and repealing Directive (EU) 2016/1148.

between their respective members, preclude the sharing of plans and complicate streamlined flows of information. Recurrent information sharing is also required between the two PESCO projects involved. Too often, the exchange of information relies on personal relations between individual staff members. Enduring cooperation and the long-term retention of lessons learnt during exercises and operations requires the expansion and formalisation of interinstitutional, international and interdepartmental working relations. Therefore, a comprehensive and permanent information sharing platform must be considered."[32]

Work on digitalisation continues on the EDF project "**Secure Digital Military Mobility System**" (SDMMS) for exchanging information related to military mobility. The project is receiving EUR 9 million in funding from the EDF. Project SDMMS stands to be "**a comprehensive digital solution** facilitating the **exchange of information on military mobility** in an efficient, secure and timely manner (during peacetime)." The system facilitates direct and secure exchange of information between nations requesting and approving the mobility of military units, personnel, equipment, and supplies. The consortium is formed by a group of 11 organisations from 10 EU Member States (BG, CZ, EE, DE, LV, LT, LU, PL, NL, RO) and Norway as an associated country.[33]

The project aims at a "secure and digital sharing of form 302 data among countries and between customs and military agencies" and "full processing of diplomatic clearance, deployment permits, and annual permit documents for sea, air, and surface modes of transportation" while introducing a federated system architecture. As an important achievement, the project introduces "**automated data exchange with LOGFAS EVE and other national systems**." SDMMS is designed to handle the processing of movement requests and approvals for various types of missions, including:

- Permit to deploy
- Request to visit (for personnel visiting foreign bases)
- Diplomatic Clearance for military and state aircraft
- Diplomatic Clearance for military vessels
- Authorisation for convoy and oversized/overweight movements
- Permission for rail and inland waterway movement

61.54% of Member States reported participating in bilateral and/or multilateral agreements in place that simplify such procedures, while the vast majority of Industry reported that the inquiry was not relevant. The most common frameworks for participations were: Permanent Structured Cooperation (PESCO), EDA Customs, "Secure Digital Military Mobility System" (SDMMS), and CBMP, NORDERFO and NATO's Joint Support Enabling Command (JSEC).

In July 2025, a **separate consultation procedure with** the **customs administrations** of the Member States took place about the measures they have taken or intend to take to ensure the correct use of Forms 302. National customs administrations were requested to

[32] Van Hoeymissen S. *'Dual Use and Military Mobility Seminar Report: Fast-tracking Military Mobility'*, *Ibid*.
[33] Secure Digital Military Mobility System (SDMMS).

report on any other issue that may have arisen at national level in connection with the use of these Forms. The outcome of the consultation procedure is summarised below.

Member States have Confirmed that the form 302 is being used as per the instructions in the relevant EU guidance document, without major issues. The guidance document has been uploaded on the websites of the national customs administrations, accompanied, in most of the cases, with national instructions and, more rarely, with national legal acts. Dedicated training for the customs officers are organised at national level, as well. The customs authorities give priority to military consignments and they maintain close cooperation with the competent military authorities, to facilitate the military consignments and address effectively and efficiently any possible incidents on the field.

According to the majority of the Member States, no significant delays in the transborder movements of military goods covered by a 302 Form have been encountered. However, some incidents have been reported by few Member States. One Member State stated that the customs authorities do not receive any notification by the NATO forces at destination, systematically; those NATO movements are discharged, from a customs point of view, by alternative evidence (the local NATO forces take responsibility for the movements). Another Member State reported vagueness of the descriptions of the goods, incorrect declaration of the country of destination, missing signatures and lack of shipping documents, which may cause delays in the process. A Member State further referred to the fact that the form is filled in by hand, which makes its reading difficult. Yet another Member State reported one case where the form covered many trucks arriving with a time difference at the external borders of the EU (towards a non-Union country), however the form was presented to customs with one of the last trucks. In addition, non-customs requirements for the movement of the goods (e.g. prohibitions and restrictions) have been reported as a main obstacle for the smooth flow of goods. In many cases there are national requirements applicable even to the intra-Union movement of goods.

To solve these issues, Member States stated that a digitalised environment for Form 302, allowing for automated processing and risk analysis and speeding up the release of the goods, would be welcome. Emphasis has been given to the need for timely and accurate provision of information on the military movement of goods by the competent authorities of the exporting country, in accordance with the established rules of the European Union and the NATO. The quality and completeness of the data provided in Forms 302 play a key role in assessing the possibility of their acceptance without delay. One Member State would encourage the publication of common guidance for customs and military authorities, for a common understanding of the various rules and processes. It was also suggested that the non-fiscal requirements be reconsidered by the national authorities, both customs and other than customs, when it comes to goods moved in the context of military missions. An EU Regulation providing for a waiver from or mitigation of the above requirements at EU level would be welcome.

2.1.3.1 Lack of an emergency definition and uncoordinated approach to address emergencies; absence of its corresponding clear emergency framework at EU level

The **Seminar on Dual-Use Capabilities and Military Mobility** hosted on February 2024 by the Belgian Presidency of the Council revealed that “EU Member States understand key concepts differently when discussing military mobility. The coherent implementation of

the actions identified in the Action Plan 2.0 and beyond requires Member States to have a shared understanding of the legal and administrative concepts that define their actions."[34] "In the continuum between peace and war, the extremes will cause the fewest problems for military mobility. In times of peace, military transports are limited and can be planned and prepared for well in advance. In times of war, administrative burdens and legislative hurdles will become largely irrelevant. The most challenging situation is the 'in-between phase'. In a crisis, such as we find ourselves in today, we face a higher demand for military movements, but without a clear-cut legal basis to prioritise military over civilian traffic."[35]

A major structural shortcoming in the current regulatory environment is the **absence of a definition of emergency situatio**n and its **associated framework**. Critical challenges arise when the demand for military movements surges but legal basis for armed forces' activities remain unclear. This gap sustains divergent national practices, legal uncertainty, and procedural delays at precisely the moment when rapid deployment is most needed. The stakeholders in the targeted consultation also pointed to the lack of such definition as a problem.

Even if, for the purpose of the functioning of the internal market, Regulation 2024/2747 or IMERA (Internal Market Emergency and Resilience Act) proposes a definition of "internal market emergency mode"[36], the absence of a "military transport emergency situation" definition and framework constitutes a fundamental problem driver. It sustains fragmentation, generates uncertainty for both civilian and military operators, and prevents the EU from reacting with the speed and coherence required in crisis scenarios. Establishing such a definition, with its corresponding framework graduating its levels of urgency and pre-defined rules, is essential to reduce bureaucratic burdens, and enhance readiness.

2.2 Limited and vulnerable infrastructure

The effectiveness of military mobility depends not only on the existence of harmonised rules and procedures at EU level, but also on the **availability and resilience of the underlying infrastructure**. The ability to move military personnel and equipment at scale and speed across Member States and beyond presupposes that the transport network (comprising roads, railways, ports, airports, airspace structures, logistics hubs, bridges, tunnels, fuel support infrastructure, or storage facilities) can support such movements under a wide range of circumstances. In practice, the infrastructure necessary for military mobility remains limited in capacity, unevenly distributed, and in many cases vulnerable to disruption or degradation.

The EU has already taken important steps and has developed a tested intervention logic to address physical and technical barriers to military mobility through initiatives such as the military mobility priority corridors and the financing of dual-use infrastructure under the Connecting Europe Facility (CEF). However, the investment needs substantially exceed the available budget.

Infrastructure that enables these corridors remains highly exposed to a wide range of risks. Its dual-use character means that most assets serve both civilian and military

[34] Van Hoeymissen S, *Ibid.*
[35] Van Hoymissen S., *Ibid*.
[36] Regulation 2024/2747 or Internal Market Emergency and Resilience Act

purposes, making them critical not only for defence and security but also for the functioning of the internal market. As a result, disruptions caused by natural hazards, technical failures, or deliberate hostile actions including cyber and hybrid threats could have cascading effects across multiple sectors. The strategic importance of certain transport nodes, fuel depots, logistics hubs and communication systems further increases their attractiveness as potential targets.

At present, **the level of protection of dual use infrastructure is not sufficient** to face the possible impacts of the threats. While the Council, in cooperation with the Commission and the EUMS and in consultation with NATO, has identified priority military mobility corridors, the supporting infrastructure along these corridors has not yet been prioritised or classified according to its criticality for military operations. This absence of a clear and coordinated approach leaves Member States to make such assessments individually, often based on differing criteria, methodologies, and levels of ambition. The result is a fragmented picture in which some assets receive high levels of protection while others (that may result of equal or greater strategic importance) remain insufficiently safeguarded.

The vulnerability of this infrastructure is compounded by the **absence of binding, harmonised resilience measures specifically tailored to the needs of military mobility**. The existing EU framework established by Directive 2022/2557 on the resilience of critical entities (CER Directive) sets horizontal requirements for the protection of critical entities across several sectors, including transport. However, this Directive was not designed to address the specificities of infrastructure that supports military mobility, nor the operational demands associated with defence-related transport. Many assets that are essential for military purposes (e.g. logistics terminals, including loading and unloading infrastructure, refuelling depots, or specific rail and port facilities) are outside the scope of the Directive and the entities operating them might not be identified as critical entities by Member States. Even in cases where such infrastructure is covered by the Directive, the required resilience-enhancing measures to be adopted may not fully reflect the security, confidentiality and interoperability needs of the military domain.

This gap leaves significant segments of the military mobility network **exposed to vulnerabilities.** Infrastructure that is essential for the rapid deployment or reinforcement of forces could be rendered unavailable through different kinds of intentional (i.e. hybrid) disruption, with obvious consequences for the EU's capacity to respond to crises. The lack of dedicated military resilience standards also limits Member States' ability to plan preventive measures, allocate resources effectively, and ensure that civilian infrastructure can reliably support defence movements under stress.

Ensuring the resilience and protection of such infrastructure cannot be considered solely a national responsibility as military mobility is inherently cross-border: **the interruption of one critical node can disrupt entire corridors connecting multiple Member States.** A purely national approach to infrastructure resilience therefore risks creating weak links in an otherwise robust chain. The high cost of securing all potentially relevant assets underlines the need for prioritisation: comprehensive protection of every piece of infrastructure used for military movements is neither feasible nor proportionate.

This situation creates a structural vulnerability in the EU's defence posture. The lack of sufficient level of resilience and protection of (strategic) dual use infrastructure

undermines the continuity of cross-border operations, and exposes critical civilian infrastructure to risks that could have both security and economic consequences.

2.2.1 Inadequate dual-use infrastructure for military mobility

The great majority of the EU's transport network - and many of the vehicles used on it - is **dual-use** - i.e. used for both **civilian and military transport purposes**. Such infrastructure is very expensive to construct and to maintain, and thus in the apparent absence of substantial military need, its fitness for military purposes became a lower priority. Work to address this is now well under way (see sections above), but the scale of work - and need to keep the transport system operational - require European prioritisation and coordination. In addition, the development of highly centralised control systems, while economically optimal, creates new vulnerabilities which must managed.[37] The large-scale transport of such assets at scale and speed over longer distances requires adequate infrastructure, which "must be resilient enough to continue providing the essential services that underpin the EU's economy while also enhancing its competitiveness and meeting the increased demands of the military forces. This includes withstanding potential attacks."[38]

The **EUR 1.7 billion** under the current MFF allocated to support dual-use transport infrastructure through the **Connecting Europe Facility** (CEF). Although the military mobility budget was initially planned along five calls of EUR 330 each, given Russia's war of aggression against Ukraine the military mobility **budget was frontloaded** as of 2022 and fully spent out in three calls in order to expedite and maximise support to such dual-use military and civilian transport infrastructure projects.

Together with the CEF expenditure of the first ever military mobility budget, important improvements to the military network have been realised. However, a takeaway from the calls under that envelope, which also echoes ECA's recommendations included in the 2025 audit report, indicated that a more strategic targeting of the investments was needed for the better use of the limited funding available, and ultimately to speed up the development of a well-structured, continuous and coherent military mobility network.

To add to the aforementioned identification of the **four priority military mobility corridors,** adopted in March 2025 by the Council as part of the EU Military Requirements for Military Mobility, the Commission started identifying the **main gaps and bottlenecks** on the priority corridors. Together with the Ministries of Transport and Ministries of Defence of Member States, and in cooperation with NATO and EUMS, a **list of "hotspots"** has been developed to determine the **most urgent investment needs** along the **EU military mobility corridors**. This list of approximately 500 projects concerns targeted and particularly short-term quick-win investments to bring the priority military mobility corridors in line with the Military Requirements and make the network more resilient.

Over 100 billion EUR is needed for projects such as the reinforcement of road and railway bridges, enlargement of tunnels, and overall capacity increase of road, rail, ports and airports, etc. The need for an **interoperable railway network**, as a key enabler of smooth military mobility within the EU, highlights the urgency of transitioning to the European standard gauge and aligning key technical systems (in particular full deployment of

[37] Community of European Railway and Infrastructure Companies, Position paper "Rail's Vital Role in Enabling the Future of EU Defence", February 2025, p. 1.
[38] *Idem*.

ERTMS) along priority corridors in the concerned Member States and in Ukraine. The White Paper for European Defence-Readiness 2030 highlighted that these key bottlenecks need to be addressed as a matter of urgency.

Stakeholder consultation results confirmed what has been reflected before: **Europe's transport infrastructure** is **not sufficiently adapted to dual-use purposes** when it comes to military mobility, creating systemic delays and vulnerabilities. Civilian transport networks (rail, road, maritime nodes, and air) were largely developed without military requirements in mind and remain under-upgraded for dual-use standards.

In the air domain, TEN-T has already identified a network of dual-use airports. However, in view of increased military operations, including longer-range cross-border operations, there is a need to evaluate if the identified airports have the necessary capacity, equipment and capabilities to handle the requirement military operations. EASA developed Guidelines for the installation of military equipment on civil aerodromes[39] that should be applied to upgrade these dual-use airports where required. The following areas would deserve assessment in priority: rescue and firefighting and aerodrome emergency plan, aircraft refuelling, runway surface condition reporting, use of military equipment in civil airports, inclusion of military representatives in local runway safety teams and security. Moreover, the most performant and immediately available infrastructure and services for airspace capacity and decongestion are needed to deal with the increase of overall civil and military traffic. In such case the exchange of data between the controller on the ground and the pilot in the air is essential as well as the supporting infrastructure to provide such service.

According to the stakeholder consultation results, 64.1% of Member States and 70.83% of industry stakeholders emphasised **infrastructure bottlenecks as a major obstacle**, yet less than half of stakeholders confirmed that their national strategic infrastructure lists were aligned with EU-wide priorities.

The EU's currently fragmented, under-prepared and insufficiently dual-use infrastructure base remains a critical driver of the current limitations in military mobility. Unless systematically addressed, these gaps will continue to delay deployments, create operational vulnerabilities, and erode credibility of EU and NATO rapid reaction capabilities.

2.2.2 Insufficient and uncoordinated identification and protection of strategic dual-use infrastructure

The resilience of the EU's strategic infrastructure on which military mobility relies is increasingly jeopardised by the **absence of coordinated and comprehensive protection measures**. In today's security environment, shaped by hybrid threats, cyber attacks, and sabotage, the safeguarding of transport corridors, logistics hubs, and energy supply chains is a pre-requisite for ensuring the continuity of force projection and reinforcement operations. Yet current protection frameworks remain fragmented, uneven across Member States, and insufficiently aligned with NATO standards. While significant progress has been achieved through CEF investments and the identification of EU military mobility corridors, the need to **upgrade, adapt, and protect key dual-use infrastructure** remains urgent. The inadequacies in both capacity and protection not only undermine military

[39] Expected to be published in the last quarter of 2025

transportation but also place civilian functions at risk, including civil protection operations, humanitarian relief, and the continuity of essential supply chains.

The **dual-use character** of infrastructure adds further **complexity**. Ports, airports, rail hubs, inland waterways and road networks serve simultaneously as arteries of civilian traffic and as potential military lifelines. Insufficient adaptation and protection thus pose a **dual risk: adversaries** targeting one corridor to delay military reinforcements could equally paralyse vital civilian supply chains, humanitarian aid, or disaster response operations. In this respect, the **security of dual-use infrastructure is inseparable** from the wider resilience of European societies. Despite ongoing investment, protection of strategic dual-use infrastructure remains fragmented and nationally siloed. While some Member States conduct systematic vulnerability assessments of ports, airports and rail hubs, others apply minimal or inconsistent standards. As a result, military corridors often contain single weak nodes that compromise the entire chain of mobility. This has been amply reflected in the stakeholder consultation: 64.1% of Member States identified infrastructure bottlenecks as a major obstacle, but fewer than half confirmed that systematic resilience assessments are embedded in their national planning. In this sense, the **CER Directive framework** sets horizontal requirements for the resilience of critical entities across several sectors, including transport; however, the Directive does not address the particular characteristics of infrastructure that support military mobility, nor the operational demands associated with defence-related transport.

At the same time, 47.91% of industry stakeholders reported not being systematically involved in resilience planning, despite controlling large portions of the civilian infrastructure on which military movements depend. In the consultation, stakeholders noted that such infrastructure not only requires protection, but also resilience, therefore continuous improvements in this area must be made. The **procedures** must be **standardised and digitalised**, improvements must be made in the **protection of critical infrastructure** (e.g., further investment into the protection of sensitive areas), as presently critical entities are often insufficiently protected. Industry stakeholders also emphasised the necessity to enhance protection on transport infrastructure (mostly railway networks against espionage and sabotage, bridges, tunnels, ports, airports and corridors), critical entities (potential targets for cyber-attacks or sabotage), and of data and digital systems.

In that context, the **ownership and control of critical transport infrastructure and mobile transport assets** are of critical importance to stakeholders. The White Paper for European Defence-Readiness 2030 therefore also identifies the need for, **stricter rules concerning the ownership and control of such assets**.

In parallel, **hybrid threats** have exposed **systemic vulnerabilities**. Transport management systems, customs platforms, and/or satellite navigation signals have become frequent targets of disruption. While Member States expressed support for digitalisation of systems, many warned that without coordinated cybersecurity requirements, such platforms could themselves become points of failure. Notwithstanding the progress made (see, for instance Directive 2022/2555[40], NIS2 Directive), recent cyber incidents against European logistics networks, as well as repeated GPS spoofing near conflict zones, underscore the urgency of establishing **robust fallback mechanisms and reinforce cross-border interoperability**.

[40] Directive 2022/2555, (NIS 2 Directive)

A further concern is the **lack of pre-agreed fallback mechanisms**. At present, there is no EU-wide framework to guarantee alternative corridors or redundant nodes in case of sabotage, natural disaster, or overload. The issue is most acute along the eastern flank, where infrastructure is sparse and fuel supply chains remain underdeveloped. Member States reported difficulties in securing sufficient fuel for deployments, while industry stressed that ports with the storage and handling capacity required for naval operations are limited in number and unevenly distributed. The sabotage of the Nord Stream pipelines in 2022 demonstrated how the targeting of critical infrastructure can create immediate operational and strategic vulnerabilities, yet the EU has not extended a similar protection logic to its transport corridors.

The consequences for operational readiness are direct and significant. Single points of failure (whether a vulnerable bridge, a non-hardened tunnel, or an inadequately protected port) can paralyse cross-border movement, delaying the reinforcement of forces and undermining deterrence capabilities. In the event of potential coordinated hybrid attacks, adversaries could exploit weakly protected nodes to systematically disrupt logistics chains, forcing re-routing through infrastructure unable to bear oversized military loads. The lack of EU-NATO coordination in protection planning further aggravates the problem; NATO's reinforcement strategies assume predictable and resilient corridors, but without EU-level alignment, those assumptions are not guaranteed.

Ultimately, the **insufficient and uncoordinated protection of strategic infrastructure erodes the EU's credibility as a security actor.** To address this, a common framework is required, harmonising resilience requirements, integrating EU and NATO vulnerability assessments, ensuring (redundancy) and fallback corridors, and establishing robust cyber defences for digitalised systems. Critically, industry must be systematically engaged in resilience planning, given its role as the owner and operator of most transport assets.

Unless such measures are introduced, Europe's corridors will remain exposed to disruption and exploitation, leaving the EU's deterrence posture vulnerable at the very moment when rapid and reliable mobility is most essential.

2.3 Low availability of transport assets

While fragmented rules and vulnerable infrastructure already constrain the effectiveness of military mobility in Europe, these challenges are furthered by a **persistent shortage of suitable transport assets needed to carry out large-scale military movements** at short notice, especially for heavy military equipment.

Over recent decades, Member States have progressively reduced their national military transport and logistics capabilities, increasingly relying on commercial providers to perform functions once covered by dedicated military mobility assets. Being part of enabling capabilities, logistics capabilities were the first ones to cut in times of decreased defence budgets. This **structural downsizing**, while reflecting post-Cold War budgetary and operational thinking, has left Europe dependent on market-driven, fragmented, and often insufficient civilian (and dual use) transport capacities. As Boeke (2023) states, "collective defence disappeared from sight, and all attention was focused on out-of-area operations […] Military logistics adopted business principles and processes were designed

for market efficiency. Elements of transport, support and other services have also been or will be outsourced to commercial parties."[41]

This **dependency and the lack of own military transport assets** create vulnerabilities that become particularly acute in times of crisis or heightened operational demand. Commercial transport capacities are optimised for civilian logistics chains and may not be readily available, adaptable, or secure for urgent military transport. The civilian sector operates according to commercial incentives, seasonal fluctuations, and private contractual commitments, which may not align with the timelines and priorities of defence transport. When large-scale or simultaneous military transport needs surge, competition for limited civil transport resources intensifies, leading to bottlenecks, delays, and cost escalations. There is also currently limited visibility on available dual-use transport capacities that would be accessible for the armed forces.

Similarly, **procedures for accessing private-sector equipment or services vary widely among Member States**, reflecting different national legal systems. Some Member States maintain *ad hoc* contractual arrangements or rely on informal cooperation with industry.

Without sufficient access to transport and logistics resources, Member States cannot either adequately simulate large-scale movements or evaluate the resilience of the network under operational conditions. As a result, the EU's overall preparedness to support large-scale or time-sensitive military transport remains constrained.

The lack of cooperation in sharing assets exacerbates this shortfall. Although certain multinational initiatives, (the European Air Transport Command or the Multi Role Tanker Transport Capability) have demonstrated the benefits of shared logistics, their scope remains limited and mode-specific. **Member States do not have a framework to request or aid with military transport needs in a coordinated, transparent, and efficient manner.** This leads to suboptimal use of available assets, as some Member States may possess unused capacity while others face acute shortages.

2.3.1 Underinvestment or supply shortages of (or gaps in) military mobility capabilities at the disposal of EU Member States.

"It is important to stress that **each EU Member State** remains **primarily responsible for investing in its own infrastructure**, and that **military requirements and priority corridors** must be considered as **national investment decisions**. However, building the connections between respective national plans requires additional EU funding [...] Member States must therefore complete the identification of the priority military corridors, the technical and geographical gaps as well as the additional actions and funds required to mitigate those gaps as soon as possible."[42]

Persistent underinvestment and chronic shortages of specific transport capabilities continue to constrain military mobility in the European Union, despite recent advances in the policy framework. Stakeholder consultations confirm the magnitude of this perceived problem: 66.67% of Member States identified the **availability of transport assets as an obstacle**, with 41.03% qualifying it as a *major* problem and 25.64% as a *somewhat problematic* issue. Industry input reflects a similar pattern of perception, with 45.83%

[41] Boeke S., *'The Magic Move'*, Militaire Spectator, 14 April 2023.
[42] Van Hoeymissen S., *Ibid*.

considering the matter *relevant*, and over 25% describing it as a *major* problem. These figures indicate a structural gap between the demand for transport capabilities and the ability of the current systems (both national and EU-wide) to supply them in sufficient quantity, quality, and to ensure interoperability. As Van Hoeymissen (2024) states, "we are currently managing this more demanding and precarious strategic situation with fewer and more fragmented resources at our disposal than before. We have lost the institutional memory to organise logistical support for the force posture that is needed to deter and defend."[43]

The shortages manifest across all modes of transport. In the **land domain**, deficits are evident in the availability of rail flatbeds, heavy equipment transporters, and medical wagons, with additional interoperability constraints caused by differing rail track gauges (European Standard Gauge of 1435mm vs. 1520/1524mm and 1667mm broad gauges) across the continent. Furthermore, stepwise authorisation of vehicles, that is the suppliers' approach to authorise their vehicles one Member State at a time, leads to delays for vehicles to become useable for cross-border military transports. Long procedures and small specified areas of use determined by commercial interest delay the time to market and hamper a vehicle's availability for cross-border military transports. The **air domain** remains critically dependent on limited fleets of strategic and tactical airlift, where EU assets cannot match the scale of demand in crisis deployments.

When it comes to unmanned aircraft systems for dual-use and military mobility, shortages also persist. Drones are increasingly being explored for their potential to transform military logistics, enabling the rapid and efficient transport of supplies, equipment, and even personnel over long distances, particularly in areas where traditional transportation methods are limited or impractical. In the dual-use context, drones can be used for a range of civilian applications, such as border surveillance, search and rescue, and environmental monitoring, while also having the potential to be rapidly adapted for military use in crisis situations. The development and deployment of drones can also drive innovation, create new capabilities, and provide a strategic advantage, making them a critical component of modern military and dual-use strategies. The lack of a harmonized framework for drone testing and demonstration is hindering the development of unmanned technologies. Moreover, there is no common methodology for the development of AI-based functions for drones to assess trustworthiness, taking into account unique military requirements.

At sea, the scarcity or Ro-Ro (Roll-On-Roll-Off, or ferries) vessels and limited port facilities adapted for military handling create severe bottlenecks. Across all domains, there is a shortfall in ADR-approved vehicles and other dual-use capacities essential for the transport of dangerous goods. Such gaps directly undermine readiness, particularly in scenarios requiring rapid reinforcement on the eastern flank.

The problem driver is reinforced in its logic by **fragmented procurement patterns**. Member States continue to acquire mobility assets largely on a national basis, following diverging specifications and timelines. This reduces economies of scale, drives up unit costs, and perpetuates a high level of non-standardisation. As highlighted in the *Defence*

[43] Van Hoeymissen S., *Ibid*.

Investment Gaps Analysis and Way Forward[44] and reflected in the European Defence Industrial Strategy (EDIS), the **absence of coordinated procurement of enablers** (such as transport fleets, airlift, and logistics assets) has created "**critical shortfalls**" that persist despite rising defence budgets. Instruments such as the EDF, the proposed European Defence Industry Programme, and PESCO projects on mobility offer potential remedies, but uptake has been slow and uneven, with priorities often directed towards high-visibility weapon systems rather than mobility enablers.

Industrial constraints further exacerbate the problem. Supply chain fragility, scarcity of raw materials, and dependence on non-EU suppliers for critical components have created **production delays** and **limited surge capacity**. These vulnerabilities, noted in EU-level debates on security of supply, **expose mobility planning to risks** outside the direct control of Member States. In practice, this has led to reliance on ad hoc leasing from civilian providers or non-EU partners, increasing costs and compromising predictability.

The **EDA** is conducting a series of studies to identify **existing gaps and future requirements across the different modes of transport** relevant for military mobility. These studies are designed to provide evidence-based input for possible regulatory and policy proposals.

- The EU Rail Transport Capacity Study and the EU Inland Waterways Transport Capacity Study have both produced interim reports. These have been shared with the Commission and are serving as a starting point for the preparation of regulatory proposals in the military mobility package.
- Forthcoming work includes the EU Maritime Transport Capacity Study , foreseen for 2026, and the EU Strategic Air Transport Capability and Capacity Study, planned for late 2026 or 2027.

Ongoing PESCO projects, notably the **Strategic Air Transport for Outsized Cargo** (SATOC) and the Future (Unmanned) **Air-to-Air Refuelling Capability project** consolidate Member States efforts. In addition, the EDF **European System for Outsized Cargo Airlift** (ESOCA) **Project** is ongoing, while the 2026 EDF Work Programme will include a focus on **Autonomous Air-to-Air Refuelling**.

Complementary conceptual work is progressing through the **European Family of Tactical Air Transport Assets Capability Development Concept Paper**, which is developed with Member States and aligned with NATO. In parallel, the **Military Mobility Air Portal** (MMAP), operated by the EDA, continues to support Member States in the implementation of Diplomatic Clearances and TAs, including the CBMP TA Air.

In support of long-term resilience, the EDA presented a draft *Food for Thought Paper on an EU Strategic Airlift Reserve*, promoting the "whole of society" defence principles outlined in the *White Paper for European Defence-Readiness 2030*. This concept foresees the potential employment of a EU Civilian Reserve Air Fleet to mitigate current heavy airlift shortfalls and address identified challenges.

[43] European Commission & High Representative of the Union for Foreign Affairs and Security Policy, Joint Communication to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions – On the Defence Investment Gaps Analysis and Way Forward, JOIN(2022) 24 final, 2022.

The consequences of these capability gaps cannot be overstated; at operational level, **asset shortages** directly **reduce the EU's ability to move equipment and personnel** at scale and speed, particularly during large-scale or multi-domain operations. At strategic level, **insufficient transport capacity weakens deterrence**, as adversaries can exploit bottlenecks or target fragile nodes with hybrid attacks, knowing that redundant capacity is lacking. At societal level, the dependence on civilian-operated assets without pre-negotiated frameworks risks generating friction with commercial operators, particularly in periods of crisis when both civilian and military demands converge.

Underinvestment and uncoordinated procurement have left the EU with insufficient and unevenly distributed mobility assets. Without systematic and collaborative investment in enablers (rail and road transport fleets, Ro-Ro vessels, strategic airlift capacity, etc.) combined with stronger coordination of industrial policy and security of supply frameworks, Europe's military mobility will remain constrained, vulnerable and dependent on external actors.[45] [46] Fragmented and under-strength transport assets mean that the EU cannot guarantee sufficient lift capacity during transport crises. Rail shortfalls, insufficient Ro-Ro or airlift capacity, and structural weaknesses in bridges and tunnels may risk creating chokepoints and critical junctures. This evidently undermines the credibility of both EU and NATO commitments to rapid response.

Labour shortages aggravate these gaps. Both Member States and industry stakeholders reported insufficient qualified personnel in the rail, road and logistics sectors. As well as a lack of trained customs officers familiar with military-specific requirements. The predominance of non-national truck drivers in several Member States raises concerns over capabilities during crises, while industry stakeholders have flagged the urgent need for re-skilling in digital competences and military standards.

Production and procurement constraints further exacerbate the asset deficit. Only 23.08% of Member States and 50% of industry reported the ability to scale up manufacturing during a crisis, conditional upon financial support, clear demand signals and streamlined governance. The absence of common EU standards for procurement risks perpetuating interoperability issues, particularly in the rail sector.

While 69.23% of Member States and 62.5% of industry expressed support for pooling and sharing of strategic dual-use assets, stakeholders cautioned that such mechanisms require strict allocation rules, legal clarity and centralised management, ideally in cooperation with NATO. Concerns remain that pooling may be feasible in peacetime but could hinder rapid mobilisation during crises.

2.3.2 Limited visibility on existing military mobility capabilities (including dual-use capabilities) across the EU

Another problem driver impeding the optimisation of military mobility in the EU is the **lack of comprehensive, reliable, and interoperable data** regarding existing **transport**

[45] European Parliament Research Service, European Added Value in Action briefing " Towards a comprehensive and beneficial approach to military mobility", September 2025.
[46] Abundant reference in Joint White Paper for European Defence-Readiness 2030 (ST 7293/25, dated 20 March 2025).

and mobility capacities (both purely military and dual-use) among Member States. This limited visibility exacerbates already existing capability shortfalls and undermines effective planning, procurement, interoperability, and joint operation capacities.

Stakeholder consultation input points at evidence that, although most respondents recognise capability shortages (66.67% of Member States flagged availability of transport assets as problematic, whereas 45.83% of industry respondents did so) the precise inventory of assets, their location, readiness status and compatibility remain considerably opaque. There is currently **no EU-wide registry or portal** that allows decision **makers to see in real time** (or near real time) **what assets are available** in which Member State, under what conditions, and with what technical specifications (e.g. load capacities, rail gauge compatibility, ADR-approved vehicles, etc.).

This lack of visibility extends to dual-use assets. Industry stakeholders and Member States alike indicated that they are not always aware of the capacities managed by civilian infrastructure operators (ports, rail operators, road hauliers) that could be mobilised in times of need. Because many dual-use transport assets are owned and operated outside defence ministries, and because national reporting to EU bodies is inconsistent in scope and frequency, planning for mobilisation is, then, based on partial and often outdated information.

Legal and policy documents consistently confirm this perceived problem: the *Military Mobility Action Plan 2.0* calls for improved data sharing, yet no binding mechanism has been established to mandate Member States to submit inventories of mobility capabilities. The *Defence Investment Gaps Analysis and Way Forward* emphasises the need to close "*deficiencies in mapping and transparency of defence assets*", particularly for enabling capabilities such as mobility, logistics, airlift, sealift, and transport infrastructure. Policy briefs such as the *European Parliament's Military Mobility briefing (07/04/2025)*[47] acknowledge, likewise, that while four strategic corridors have been identified under TEN-T in coordination with NATO, the oversight over which national dual-use nodes and transport hubs along these corridors are actually fit for military loading, over-dimensioned cargo or reinforced to withstand disruption, remains weak.

It is important to understand the adverse operational and strategic consequences that follow from this lack of full visibility of existing capacities. Firstly, **procurement and investment decisions are less efficient**: gaps may be overestimated in certain domains/areas while underinvestment may persist in others (leading to the consequential waste or misallocation of scarce budgetary resources).

Secondly, there are pernicious consequences when it comes to **interoperability**: without having visibility on exactly which assets in which Member States meet required standards (e.g., gauge, loading capacity, off-road capability, ADR compliance), national military plans or joint operations must build in guard-bands for compatibility, constraints on routes, or duplicative logistic assets. This increases cost, complexity, and time needed for mobilisation.

[47] Military mobility | Think Tank | European Parliament

Thirdly, **readiness and surge capacity** can be said to be compromised. In crisis or "in-between" phases (i.e. heightened tension without a formal status of armed conflict, what has been previously described as a "transport emergency situation" in this SWD), delays in identifying what transport assets are available (and where) mean that assembling capabilities for large-scale movement becomes slower. The lack of an EU-level consolidated legal picture prevents thus rapid cross-border pooling or mutual support, as military planners might not be able to call up assets whose existence is not officially recorded or whose status is unclear.

Fourthly, **strategic resilience is reduced as a consequence of the issues discussed above**. Adversaries and/or systemic rivals may exploit this lack of preparedness in poorly catalogued infrastructure or unnoticed weak nodes. Disruptions (whether naturally occurring, technical or cyber-related) affect nodes whose importance has not been fully assessed or publicised, thereby cascading effects along critical mobility corridors.

Multiple systemic factors can be said to contribute to this lack of visibility:

- Many transport assets, especially those with dual use, are owned by non-defence ministries and/or sub-national entities, private companies or civil operators; their reporting obligations to defence or mobility authorities being weak or non-standardised. This **decentralised ownership** problem has consequences when it comes to the very visibility of the assets as well as their classification.

- Some Member States maintain **inventories** of military mobility assets; others do not or only do so partially. Technical specifications, readiness state, and interoperability criteria vary, so even where data exists, comparability remains weak. European visibility over railway rolling stock has been provided by the European Vehicle Register (EVR) for many years[48] and access can be obtained for legitimate users, including national armed forces[49]. However, the potential of these access rights has not been fully utilised and it may not contain sufficient information to determine the vehicle's usefulness for military transports. Similar systems do not exist at EU level for other modes of transport.

- Defence authorities are often **reluctant to share detailed asset data** across borders or with civilian bodies due to security classification requirements, national security concerns, or concerns about exposure to intelligence or cyber risks. This reduces granularity and timeliness of shared data.

- As mentioned before in this SWD, the **lack of a binding EU requirement** or legal framework means that existing initiatives, including reporting under TEN-T corridors and PESCO mobility projects, do not yet impose binding standards or timelines for the provision of data on (existing) capabilities.

- **Resource constraints** are always a systemic factor impeding visibility: even in those cases with good data-collection practices, financial, institutional, and

[48] Report From the Commission to the European Parliament and the Council on the progress made towards achieving interoperability of the Union rail system and the functioning of the European Union Agency for Railways in this context, COM/2025/384 final.
[49] Sections 3.3.1 and 3.3.2 of Commission Implementing Decision (EU) 2018/1614.

technical resources to maintain up-to-date registries (on the operational status, potential deterioration of assets or maintenance cycles) are often insufficient.

The W*hite Paper for European Defence-Readiness 2030* explicitly identifies "*Military Mobility: EU-wide transport network enabling rapid movement of troops and equipment*" as one of the seven *Critical Defence Capability Areas*. As part of it, the European Commission proposes to increase the visibility and mapping of dual-use transport assets and ensure regulatory reforms to better reflect military mobility needs. Furthermore, in the Military Mobility call for evidence launched mid-2025, the European Commission committed to "*identifying critical infrastructures for military mobility having a European dimension and strengthen their resilience.*"

The **limited visibility** of existing military mobility capabilities across the EU functions as a key driver of low asset availability. It undercuts efficient procurement, hinders interoperability, complicates logistical planning, and increases time lags in rapid deployment scenarios ("transport emergency situation"). Without concerted effort towards building an interoperable, secure, and regularly updated capability registry (dual-use assets included), Member States and the EU as a whole risk persistent underperformance in military mobility under crisis conditions.

Military mobility capabilities extend beyond the availability of transport assets and include a wide range of enabling services essential not only for the movement but also for the **sustainment of forces**. In NATO doctrine, such services are embedded in the broader framework of Host Nation Support (HNS) and are critical to ensuring operational continuity during transit and deployment. These capabilities cover, *inter alia*, the provision of accommodation, restroom and washing facilities, dining facilities and meal services (including pre-packaged rations), medical support, and secured areas for rest, assembly, and light maintenance (e.g., small workshops). They further encompass logistical functions such as the establishment of refuelling points, supply of fuels and lubricants, waste disposal (including hazardous waste), and the provision and operation of exchange services (PX) for items of daily necessity. The absence or fragmentation of such HNS-related services across Member States creates additional friction in military mobility, as forces may be delayed or rendered dependent on *ad hoc* arrangements, undermining the predictability, sustainability, and of large-scale movements.

2.3.3 Inefficiencies in optimal use of military mobility capabilities (including dual-use capabilities)

Even where military mobility and dual-use transport assets are available, **inefficiencies in their utilisation** significantly **reduce their operational effectiveness**. These inefficiencies stem from suboptimal matching of capacity to need, insufficiently targeted project selection, bureaucratic delays, and under-utilisation of existing dual-use infrastructure. Together, they contribute to redundancy, cost inflation, and loss of readiness.

In the stakeholder consultation, a major proportion of respondents identified that **transport assets are under-utilised or not activated rapidly enough**. Although 66.67% of Member States considered asset availability a problem, many also reported that even those assets that exist are not always used to full capacity due to regulatory, procedural, or logistical barriers. For example, industry inputs noted that last-minute route changes, escorting

requirements, and delays in obtaining cross-border permissions reduce throughput of transport assets.

Complementary data stems from the European Court of Auditors audit of the *Military Mobility Action Plan 2.0*.[50] The audit reported that EU funding under the CEF earmarked for dual-use transport infrastructure (EUR1.7 billion for 2021-2027) has been allocated rapidly to meet the urgency and to expedite the effects of dual-use investments, but project selection did not always clearly align with strategic planning **.** Inefficiencies also may arise from **redundant** (and) **underused assets or civilian dual-use assets not integrated into military readiness.** Because dual-use assets frequently belong to civilian operators, there is often no prearranged framework for their activation or prioritisation in crises (which leads to delays in mobilisation or missed opportunities for harnessing an efficient use of economies of scale).

Several structural and regulatory sources contribute to these inefficiencies:

- CEF calls for dual-use projects have a **high oversubscription** rate indicating that the considerable demand could not be met by available resources.

- **Regulatory/procedural delays** appear in **cross-border permissions**, in mismatches between local infrastructure limits (e.g. load limits, bridge capacity...) and military load requirements, and in bureaucratic barriers for route approvals. The ECA Special Report highlights cases in which, for example, tanks could not traverse certain infrastructure due to road weight regulations in transit states.

- Many **dual-use infrastructures** are available but are **under-utilised**; meaning, not integrated or scheduled for military use in a prioritized or predictable manner. Assets may then be left idle or used in low-military-value ways due to lack of interoperability, lack of readiness planning, or because civilian regulations restrict their use under certain conditions.

- Even when assets are procured or infrastructure is upgraded, the **gap between physical capacity and activation** for military mobility remains wide. Transport assets sit unused or under-deployed because necessary legal or administrative triggers (clearances, emergency definitions, priority access) are not in place or are too slow.

The impact of these inefficiencies on readiness is substantial. Precisely because asset utilisation is sub-optimal: (i) **the time to mobilise is lengthened**, reducing the EU's capacity for rapid response and deterrence especially in "in-between" phases of crises; (ii) **costs may escalate** considerably. Underused assets still incur maintenance, staffing or depreciation costs without yielding readiness, while emergency activation often necessitates expensive last-minute solutions (e.g. chartering, rerouting); (iii) operational plans must include larger **margins of error** (buffer times, alternate routes, excess capacity), thereby reducing efficiency and scalability; (iv) **interoperability** is considerably weakened. When dual-use assets are not standardised or activated, different Member States

[50] ECA Special report 04/2025.

are much more likely to maintain redundant or incompatible inventory, which complicates cross-border logistics and increases administrative overhead.

Under the existing, aforementioned policy instruments (Action Plan on Military Mobility 2.0, TEN-T revised Regulation, PESCO projects related to mobility) there is **no recognition of these inefficiencies**. For example, TEN-T now includes legal recognition of military mobility; however, the implementation of priority access rules and cross-border movement permissions remain uneven. The mentioned EP briefing on military mobility notes that, while 95 dual-use infrastructure projects have been funded in 21 Member States, criticisms persist that project selection "overlooks geopolitical priorities" and that "bureaucratic barriers remain".

Most recently published European Commission estimations of needed investment also underscore inefficiency: a recent estimate indicated that approximately EUR70 billion will be required to adapt rail, road, sea, and air corridors to allow for short-notice, large-scale movements across the EU and partner countries (far exceeding current dual-use mobility investment envelopes).

2.4 Coordination challenges, and the whole-of-government, whole-of-society approach.

The effectiveness of the EU's efforts to strengthen military mobility depends not only on the existence of clear rules, resilient infrastructure and sufficient transport assets, but also on coherent and effective coordination and governance at the national level and in broader context.

While Ministries of Defence remain central in defining operational requirements and identifying priority movements, the practical implementation of military mobility depends to a large extent on civilian authorities, national regulators, infrastructure managers and civilian transport contractors. This reflects the inherently dual-use nature of the domain: military movements rely primarily on civilian transport networks, subject to national and EU regulatory frameworks, and are deeply intertwined with broader questions of customs, infrastructure, energy, and overall resilience. An example of a specific issue for the air domain is the lack of airspace available for training purposes while the new military assets will require more airspace than before.

The experience of recent years has shown that regulatory fragmentation, insufficiently adapted infrastructure, and capability shortfalls are often the result of obstacles outside the competence of defence authorities. Cross-border permissions for troop movements depend heavily on ministries responsible for transport, customs and border management, and sometimes even environment or public safety. The adaptation of bridges, tunnels, and airports to accommodate outsized military equipment require coordination with civilian transport planners and operators. The protection of transport corridors against cyber or hybrid threats engages not only defence but also national cyber security centres, energy regulators, and law enforcement bodies.

Military mobility therefore requires a **systemic approach** that goes beyond traditional defence policy and embeds security considerations across multiple civilian domains. At national level, this translates into the necessity of **genuine inter-ministerial cooperation**. Ministries of transport play a decisive role in ensuring that infrastructure planning takes

account of military requirements and that projects financed under EU or national budgets are designed accordingly.

Customs and taxation authorities are indispensable to the harmonised application of customs procedures, including the use of the EU/NATO Form 302. Ministries of foreign affairs are responsible for the coordination of cross-border arrangements, including those involving NATO and partner countries, while civil protection authorities contribute to ensuring the resilience and continuity of transport corridors in the event of crises. The engagement of ministries responsible for energy, environment, and climate adaptation is equally necessary to ensure that transport infrastructure is not only physically adapted to military requirements but also resilient to long-term systemic risks.

An example of best practices: multi-stakeholder platforms in Lithuania and Finland.

- Cooperation between national stakeholders in **Lithuania** (ministry of defence, transportation, and others) takes place naturally based on the general understanding of the need to have a whole of government approach and the urgency to enhance military mobility.

- The whole of government **Finnish model** is an approach undertaken in many policy areas for decades. Finland has set up a National Coordination Group on military mobility since 2018 that comprises of ministries and governmental agencies. Any government entity or local level administration structure can be invited to join based on needs and relevance.

At EU level, a **whole-of-government approach** requires the systematic involvement of all relevant Commission services and other EU bodies. The European External Action Service (EEAS), including the EU Military Staff, is also a co-implementor of the Action Plans and ensures coherence with the Common Security and Defence Policy (CSDP) and with the EU's external action more broadly, while the European Defence Agency (EDA) provides technical expertise, acts as an interface on behalf of the Ministries of Defence of Member States, specifically in the areas of cross-border movement in all domains. Moreover, the framework of Permanent Structured Cooperation (PESCO) provides a forum for cooperation and exchange of information and good practices.

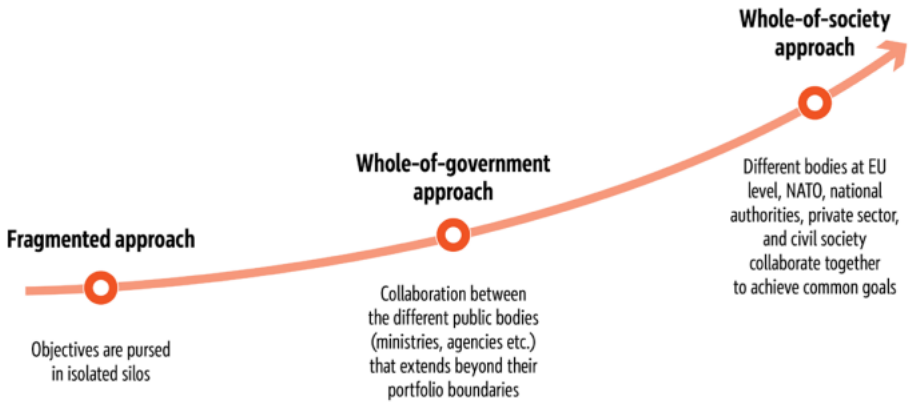
Beyond the need for whole-of-government approach military mobility also requires a **whole-of-society approach**, involving stakeholders beyond public authorities. Infrastructure operators, logistics companies, rail and port authorities, and the wider transport sector are key to ensuring the availability and resilience of critical assets. Civil stakeholders, such as research organisations and technology providers, support innovation in mobility and resilience, while social partners and local authorities help ensure acceptance and implementation at local level.

These combined approaches could also "help to create more awareness of EU actions and initiatives on military mobility in EU member states" (Chihaia, 2024)[51]. The Draghi

[51] Chihaia M.S., *'Military mobility 2.0 revisited: Lessons learnt'*, European Policy Centre, 13 November 2024.

Report of September 2024 on "The Future of EU Competitiveness"[52] and the Niinistö Report of October 2024 "Safer together: Strengthening Europe's civilian and military preparedness and readiness"[53], reiterate the relevance of the whole-of-government, whole-of-society approaches. In fact, "investment in transport infrastructure can be of triple use, simultaneously benefitting the EU's trade flows, the EU's Common Security and Defence Policy and NATO's Concept for Deterrence and Defence of the Euro-Atlantic Area."[54] Taken together, these two approaches provide the only framework capable of delivering the systemic improvements necessary to remove all remaining barriers to military mobility and to ensure the EU's readiness in the face of future crises.

Figure 5 : Whole-of-society approach, as presented by "Towards a comprehensive and beneficial approach to military mobility", European Parliament Research Service briefing.



The ECA Special Report 04/2025 is particularly poignant when evaluating coordination challenges in this area[55]. ECA recommends to improve the governance arrangements for military mobility in the EU by streamlining coordination between the EU, member states and other stakeholders and enhancing existing synergies and interaction. NATO, whose membership overlaps with that of the EU, remains a parallel but essential framework in shaping military mobility requirements and standards.[56]

Although the dual-use nature of military mobility requires close cooperation among ministries of defence, transport, interior, finance and foreign affairs**, many Member States still manage their responsibilities through separate administrative channels**. Only a few have established dedicated inter-ministerial coordination structures or national contact points empowered to act across departments. The lack of a coherent whole-of-government approach complicates decision-making on cross-border permissions, funding priorities and

[52] Draghi, Mario. "Report on the future of European competitiveness", dated September 2024.
[53] Niinistö, Sauli. "Safer Together: Strengthening Europe's Civilian and Military Preparedness and Readiness", dated October 2024.
[54] NATO's Deter and Defend concept.
[55] ECA Special Report 04/2025.
[56] *Ibid.*

crisis response. It also hampers the effective integration of civilian stakeholders, whose participation is essential to a functioning whole-of-society model of military mobility.

3 WHY SHOULD THE EU ACT?

3.1 Legal basis

Acknowledging the dual use dimension of military transport and with a view to effectively address the problems identified above, the **EU should establish a set of measures** mobilising and developing the common transport policy to support the specific needs of military transport.

Further, rules on cross-border military transport need to be appropriately integrated and developed within the common transport policy, developed at Union level, in particular to take account of relevant specificities of transport carried out on behalf of the armed forces by civil companies, and also to ensure that its impact on other civilian transport is minimised and mitigated to the extent possible.

Taking into account the above, and also the fact that the Regulation includes measures applicable for road, rail and inland waterway transport, but also for air and sea transport, it is based on Articles 91 and 100(2) of the Treaty on the Functioning of the European Union (TFEU). It establishes a set of measures and lays down appropriate provisions aimed at facilitating military transport in the Union and across its external borders and minimising and mitigating the impact of such transport on civilian transport.

3.1.1 Subsidiarity: the added value of EU action

Under the subsidiarity principle, EU action is warranted where objectives cannot be sufficiently achieved by the Member States acting alone but can be better delivered at EU level. The EU can achieve speed, scale, and predictability in military mobility that Member States cannot deliver alone. It ensures coherence of investments, reduces duplication, unlocks economies of scale, and creates binding frameworks for regulatory harmonisation, creating interoperability and predictability. As the European Court of Auditors has noted, only coordinated EU-level prioritisation prevents fragmented, inefficient outcomes.

EU-level intervention has the potential to deliver distinct, demonstrable added value over unilateral Member-State action or purely intergovernmental arrangements because it can (i) remove cross-border regulatory fragmentation through binding regulatory frameworks, ensuring seamless interoperability; (ii) mobilise EU budgetary instruments at scale; (iii) create transparent, interoperable information and digital coordination; (iv) provide a legal and institutional interface for synchronising EU and NATO operational requirements; and (v) unlock economies of scale for capability/asset acquisition and stockpiling.

These advantages are relevant in light of the operational shortfalls documented in the stakeholder consultation and by ECA audits, since the EU can deliver binding regulatory harmonisation where voluntary arrangements have proved insufficient. Only a binding EU instrument can ensure uniform cross-border application of permissions, priority access

rules and the legal triggers for exceptional procedures, thereby reducing serial approval delays inherent to cross-border military transport operations.

This imperative was explicitly recognised in the EU's *Action Plan on Military Mobility 2.0*, which identifies **harmonised procedures and legal clarity as pre-conditions for effective cross-border movement**.

Both national action and voluntary intergovernmental coordination have not generated the required pace or scale of improvement. Stakeholder consultation results are clear in this regard: 76.92% of Member States reported that **cross-border military mobility is still managed through *ad hoc* coordination between ministries**, rather than structured and permanent governance frameworks. Similarly, while most Member States have signed on to the mentioned TAs, **not all of them have integrated the TAs into national procedures**, leaving the agreements non-binding and unevenly applied. From an operational perspective, 64.1% of Member States and 70.83% of industry stakeholders still identify infrastructure bottlenecks as major obstacles, while 76.92% of Member States highlight regulatory requirements (permissions, customs, dangerous goods) as the primary sources of delay.

These findings confirm that **voluntary measures**, pursued primarily through the EDA and PESCO, have delivered progress but **remain insufficient to reduce duplication, harmonise timelines, or produce interoperable systems across the EU**.

EU-level action also provides **unique budgetary leverage** to **upgrade dual-use infrastructure and finance enablers** at a geographic scale unattainable by most Member States acting alone. While the ECA has previously criticised the scale and prioritisation of budgetary allocations, the resources demonstrate the EU's capacity to direct capital to cross-border (e.g. "last-mile") upgrades, strengthening logistic nodes in a way that national budgets alone frequently cannot. Coordinated EU financing also allows projects to be selected and staged according to cross-border reinforcement logic rather than narrowly national cost-benefit calculus.

Action at EU level is indispensable in three respects that have been extensively reflected upon in the "Problem definition and problem drivers" chapter of this SWD:

Firstly, **removing regulatory barriers**: harmonisation of cross-border permissions and of the implementation of simplified customs procedures for goods to be moved or used in the context of military activities and priority rules is necessary to reduce systemic inefficiencies, which currently generate measurable delays and administrative costs. In the absence of EU action, divergent interpretations of national security concepts (e.g. "crisis" or "transport emergency") will continue to delay movement requests, with convoy transit across multiple Member States requiring serial approvals and redundant documentation.

Secondly, **pooling resources and ensuring visibility**: the EU's unique budgetary instruments (CEF, EDF, EDIP) allow investments into dual-use infrastructure and enabling capabilities that no single Member State could finance or coordinate at scale. Projects such as the North-Eastern Border Shield, investing in logistic nodes and "*rocade*" or "beltway roads" along the EU's external borders, show the potential of coordinated EU-level support to enhance resilience. At the same time, EU-level action can incentivise stockpiling systems and transnational logistical hubs, ensuring coherent use of scarce civilian and dual-use assets across Member States.

Thirdly, **strengthening coherence with NATO**, since the Alliance lacks the EU's legal and budgetary instruments to drive regulatory harmonisation and infrastructure investment. EU action therefore complements NATO by ensuring that Member States (23 of whom are NATO Allies) have a harmonised and reinforced set of procedures and infrastructures at their disposal.

Fourthly, **customs legislation is an exclusive EU competence**. Action at EU level has the potential to address the cross-border and systemic nature of present and foreseeable military mobility challenges by harmonising procedures and developing digital solutions,

The persistence of fragmentation despite two action plans and multiple voluntary frameworks illustrates that only action at EU level; that is, **binding, coordinated, and adequately financed, can ensure the speed, scale, and predictability of movement required** under the new security context under which the EU is called to act in today's world. Subsidiarity test as detailed before, military mobility (in particular, its cross-border dimension) cannot be addressed effectively at national level. National and intergovernmental efforts have yielded (initial) progress but remain non-binding and unevenly implemented: only ~50% of Member States apply the TAs nationally, and 76.92% of Member States still rely on *ad hoc* coordination across ministries. National investments remain fragmented and risk creating "capability islands" without EU-level integration.

4 OBJECTIVES: WHAT IS TO BE ACHIEVED?

4.1 General objective

The general objective of the Military Mobility Package is to **establish a coherent and harmonised EU-level framework that enables, facilitates, and accelerates the movement of military personnel, material, and equipment across the territory of the EU**. The Regulation will contribute to improve military mobility by facilitating military transport operations, relying for this on the dual use nature of military transport.

By combining legislative and non-legislative instruments, the package aims to provide both binding provision (through the Regulation) and political/strategic direction (through the Joint Communication), supported by the analytical evidence base provided in this Staff Working Document.

4.2 Specific objectives

To operationalise the general objective, the Regulation proposal of this Military Mobility Package lays down measures aiming at:

- Streamlining cross-border military transport (establishing a uniform framework for permission procedures and ensuring uninterrupted and safe military transport)

- Enhancing emergency response (creating an efficient, coordinated, and effective framework to facilitate military transport in response to temporary, extraordinary, and urgent situations)
- Improving infrastructure readiness and protection (setting out rules to enhance the readiness of dual-use transport infrastructure and better protect strategic dual-use infrastructure against all hazards and threats)
- Fostering solidarity and capability sharing (encouraging the sharing and pooling of transport and logistics capabilities through a Solidarity Pool, and increasing visibility of existing transport capabilities for military transport)

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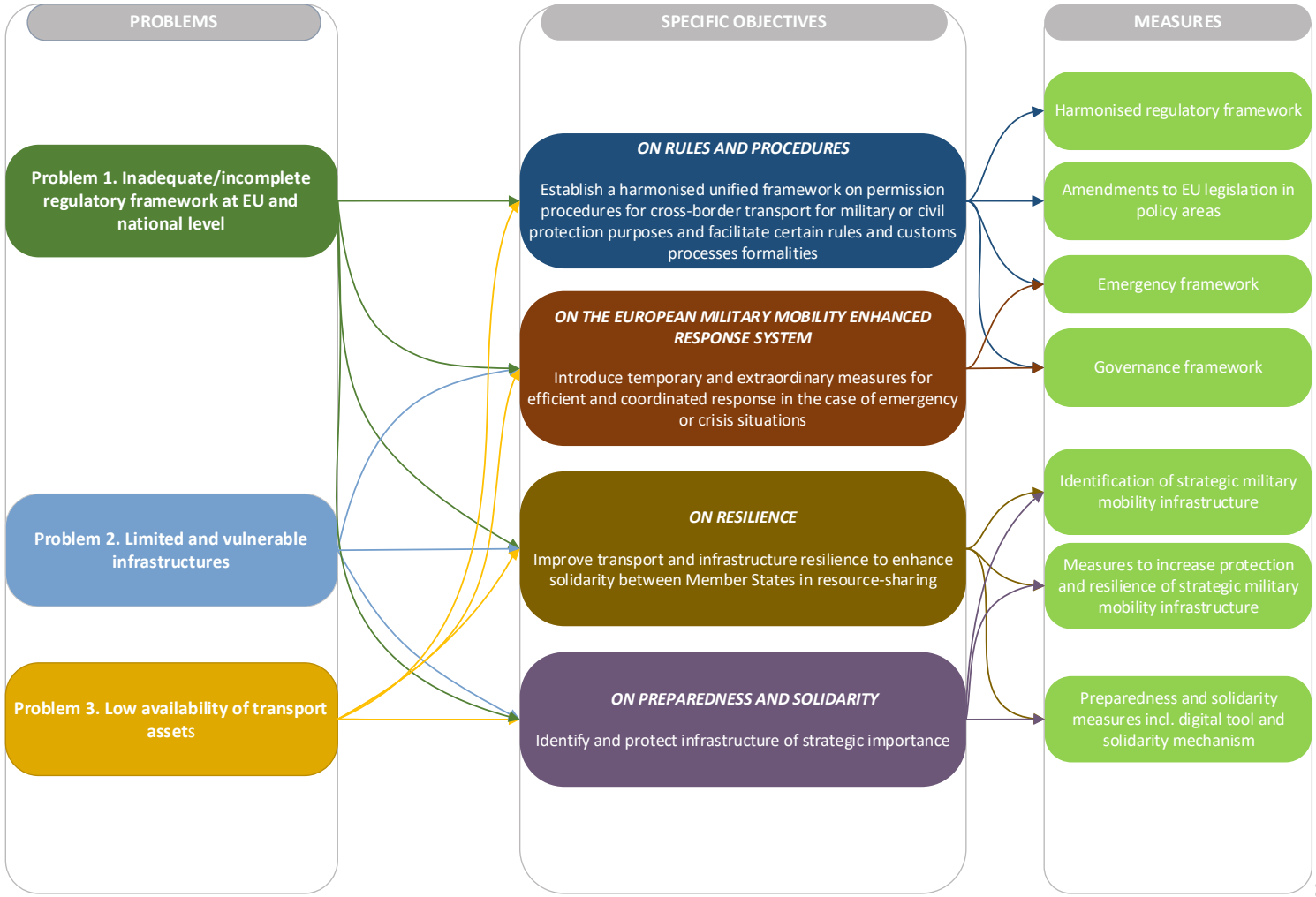
Finally, the Regulation also establishes a clear governance framework to ensure the efficient implementation of the proposed measures.

Figure 6 : link between problems, specific objectives and measures for the 2025 Military Mobility Package



Source: European Commission

5 POLICY OPTIONS

5.1 Baseline - Status quo (no EU legislative action)

The option of maintaining the current framework is the baseline against which the policy options are assessed. Keeping the current *status quo* would be tantamount to recognising the aforementioned problems and their causes while abstaining from acting to offer EU-level solutions. Stakeholder input confirmed that divergent national requirements on diplomatic clearances, customs procedures, and the transport of dangerous or oversized goods continue to generate avoidable delays and administrative burden. Member States and industry alike identified these barriers as among the most significant obstacles to military mobility. The voluntary TAs developed under the auspices of the EDA have provided useful operational guidance, but their non-binding nature has resulted in uneven implementation and persistent procedural bottlenecks. **The status quo therefore fails to support the scale of mobility required under the current security environment**. Continuing with the status quo would not respond adequately to Member States' commitment under the Military Mobility Pledge nor provide the EU with the capacity to address situations requiring a coordinated, cross-border response.

5.2 Discarded policy option

In the course of the preparatory analysis, one policy alternative was considered but ultimately discarded: pursuing a legislative initiative in the form of a directive rather than a regulation.

A legislative initiative in the form of a directive was considered but discardedA directive requires national transposition, leaving significant scope for divergence in implementation, both in terms of substance and timing. This is particularly true since, as "the 2026 deadline for meeting the Military Mobility Pledge brings open questions about the ability to deliver in a limited time span."[57] This **would perpetuate the very fragmentation the initiative seeks to overcome**, as Member States would retain discretion in adapting common principles to national frameworks. In addition, the need for speed and uniformity is paramount in the area of military mobility. Rules, to be effective in this area, must be subject to clear, directly applicable that can be implemented without delay or interpretative variance. The stakeholder consultation confirmed that both Member States and industry attach high importance to legal certainty and predictability; a directive would not provide sufficient assurance in this regard. Finally, the procedural delays associated with transposition would postpone the operational benefits of the initiative by a considerable amount of time, at a moment when the security environment requires rapid strengthening of EU-level preparedness (see White Paper for European Defence-Readiness 2030).

For these reasons, both the status quo and a directive were discarded at an early stage. Only a regulation can provide the necessary legal certainty, immediate applicability, and harmonisation of procedures across the EU, while ensuring full coherence with parallel NATO actions and avoiding duplication or delays.

[57] Chihaia M.S., *'Military mobility 2.0 revisited: Lessons learnt'*, European Policy Centre, 13 November 2024.

	Overview	*Main shortcomings/ Reasons for discarding at early stage*
***Baseline: Status quo* (no EU legislative action)**	Continuation of voluntary arrangements (e.g. EDA's TAs) and national procedures without binding EU intervention.	Does not provide the uniformity and legal certainty required to ensure rapid cross-border military mobility; inconsistent with commitments under the Military Mobility Pledge; insufficient in light of the deteriorating security environment: • Persistent fragmentation of rules and procedures across Member States. • Non-binding character of existing arrangements results in uneven implementation. • Stakeholders identify infrastructure bottlenecks, customs procedures, and dangerous goods clearances as continuing sources of delay. • Lack of predictability, interoperability, and legal certainty.
Discarded option: Directive	Introduction of EU legislative framework, leaving transposition to Member States	Ill-suited to the urgency and operational requirements of military mobility; does not ensure uniform application of rules across the Union; insufficient to address Member States' and stakeholders' demand for predictable, binding, and directly applicable procedures: • Significant scope for divergence in national transposition, undermining harmonisation. • Delays in implementation due to transposition process. • Lack of immediacy and legal certainty for operators and planners. • Risk of perpetuating administrative complexity and interpretative variance.

5.3 Preferred policy option

The preferred option is the adoption of a **Regulation** on establishing a framework of measures to facilitate the transport of military equipment, goods and personnel the Union, accompanied by a **Joint Communication** on Military Mobility. The regulation provides a binding basis to remove procedural barriers, ensure transport crisis responsiveness, strengthen governance, and enable infrastructure and capability readiness across the EU.

5.3.1 On Regulatory aspects

Rules and procedures related to military transport

The stakeholder consultation strongly confirmed the limitations of existing rules and procedures pertaining to Military Mobility. During the consultation, Member States emphasised that a **common set of rules would enable faster reaction times**, particularly for large-scale or short noticed deployments, by facilitating access to priority routes, pre-established corridors, and designated infrastructure. A uniform approach could **improve coordination between Member States and facilitate interoperability and consistency with NATO**, as well as more efficient use of dual-use infrastructure. This is why the preferred policy option entails common rules and procedures related to military transport.

<u>Cross border permissions</u>

A majority of respondents from Member States (61.54%) called for **a conversion of the CBMP TAs into binding rules**, citing the need for uniform diplomatic clearance and cross border permission procedures. Despite this broad support, several Member States stressed the importance of maintaining national oversight of goods transiting their territory.

Building on the efforts achieved with the TAs, the Regulation would establish within the Common Transport Policy a new framework to streamline cross-border military transport procedures (including diplomatic clearances) for all transport modes (road, rail, inland waterway, air, and sea). It would **not affect the sovereignty of Member States** to decide whether to move their military forces within the Union or to grant permission for another Member State's armed forces to transit through their territory. Instead, it would seek to enable the effective implementation of such sovereign decisions, thereby enhancing the overall efficiency of military mobility. The Regulation would ensure that all Member States apply the same procedures and forms for cross-border permissions, thereby significantly reducing delays and administrative complexity.

Two types of cross border permissions would be possible:

- **Standing military transport permissions**:

  This Regulation would aim to increase both **predictability and operational readiness** by creating a standing military transport permission. A standing permission would be granted by one Member State at the request of another, remaining in effect until revoked by the granting Member State. It would not be tied to any specific military transport operations but would constitute a pre-authorised permission for cross-border military transport with a pre-defined scope (e.g. number of vehicles, types of equipment transported, …). To execute a specific

transport operation, the requesting Member States would only have to notify the receiving Member State and request the necessary traffic arrangements, where relevant. When granting standing military transport permissions, Member States could agree on pre-planned traffic arrangements and pre-defined routes to facilitate permitted transport operations requiring a traffic arrangement.

The minimum scope of the standing military transport permission would be specified in the Regulation and would cover only simple military transport operations. The minimum scope could be extended in the future, to cover more complex military transport operations. This process would run in parallel with investments to upgrade the military mobility corridors, enhanced coordination on pre-defined routes for military transport operations, and reinforced access to transport capabilities. In the long run, such **efforts could pave the way to a "military Schengen"**.

- ***Ad hoc* military transport permissions:**
  These cross-border permissions would apply to specific military transport operations, either when no standing permission is in place or when the transport operation's characteristics exceed the scope of an existing standing permission. In practice, *ad hoc* permissions should mainly apply for short notice military transport operations that go beyond the agreed scope of standing permission.
  For this type of cross-border permission, the Regulation would propose deadlines in full consistency with the 2024 Military Mobility Pledge, in which Member States committed to **grant cross-border movement permissions within a maximum of three working days.**

The permission of cross-border military transport involving dangerous and abnormal cargo raises specific complexities because of fragmented national approaches. The Regulation would harmonise relevant rules. Regarding the military transport of dangerous goods, the Regulation would make it mandatory to permit it if complying with existing international conventions for civilian transport, relevant NATO rules or the national rules of NATO Allies. The Regulation would also extend the existing civilian rules for the transport of abnormal cargo to military transport and deem it permitted if it complies with these rules.

<u>Traffic arrangements and uninterrupted transport operations</u>

In addition to cross-border movement permissions and diplomatic clearances, certain cross-border military transport operations require traffic arrangements, which must be requested by the requesting Member State to the receiving Member State.. Such arrangements can cover:

- the identification of the routes for the transport of abnormal cargo or dangerous goods,
- the escorts to accompany road convoys,
- the necessary Host-Nation-Support in the context of a transport operation,
- or specific traffic safety measures going beyond ordinary rules, such as limited access to rail track crossings, blocked roads, or restricted airspace.

In addition, in the rail sector, the rail infrastructure manager also needs to allocate train paths, give specific authorisation for exceptional transports (including overweight and

oversized cargo), while railway undertakings must carry out route compatibility checks for a military transport operation. Such traffic arrangements and path allocations **help minimise adverse impacts on civilian transport activities**.

Common procedures and deadlines for requesting and granting traffic arrangements, including the coordination with infrastructure managers, are needed to harmonise and streamline processes and reduce delays and disruptions.

Streamlined procedural formalities

The Regulation would also **streamline procedural formalities and provide templates for military transport requests and notifications**, to avoid delays, inefficiencies, and operational bottlenecks. All requests and notifications linked to a military transport operation would be combined into a single permission request or notification and no additional forms should be required by any Member State. This would be without prejudice to the applicable Union customs rules, including the EU and NATO Forms 302.

Moreover, any communication between Member States linked to requests and notifications of military transport operations and traffic arrangements should be transmitted through their respective National Coordinator for Cross-Border Military Transport.

To facilitate and accelerate the smooth execution of military transport, Member States will also be encouraged to agree on pre-defined routes to be included in military transport permissions, which would also minimise the impact of military transport on civilian activities.

Adapting civilian rules for military transport

In addition, the Regulation would **introduce exemptions of military transport** from traffic bans during weekends, public holidays and other periods subject to civilian traffic restrictions. Given that military road vehicles are often heavier than civilian road vehicles, meaning there are less zero- or low emission alternatives, and that the renewal of such heavy military road vehicles is slower than that of the civilian fleet, the Regulation would also exempt military transport carried out directly by the armed forces from traffic restrictions applied on specific road sections based on the environmental performance of vehicles. Regarding rules on road cabotage operations, the Regulation would allow Member States to exempt military transport from existing restrictions. These targeted exemptions would reduce the administrative burden associated with varying national practices, enabling a more predictable use of transport networks for military purposes. In addition, to minimize disruptions to civilian traffic and ensure timely military transport operations, the Regulation would establish rules to streamline border crossings. Security and efficiency requirements, such as escorting, flagging, would be balanced with the need to avoid delays. Consequently, any required inspections or controls for goods moving through the customs territory of the Union would be deferred to the first scheduled stop after crossing the internal border of the Member State, rather than being conducted at the internal border itself.

Customs

76.92% of Member States and 58.33% of industry stakeholders identified customs formalities as a major cause of delay. The need to ensure legal clarity and coherence was a key takeaway from the consultation.

A clear definition is essential to avoid unnecessary customs delays and to ensure that military consignments can benefit from the customs simplifications provided for under the Union Customs Code (UCC). This is why the Regulation would introduce a definition of goods to be used for military activities. This definition would covers military materiel and assets used in the context of military operations, excluding goods imported for non-military purposes.

On the customs formalities, for the movement of goods related to military activities, customs legislation allows simplified procedures through the use of EU Form 302 and NATO Form 302. These forms offer significant advantages compared to standard customs declarations, though their use has so far been inconsistent across Member States. The Regulation would therefore establish the **use of Form 302 as the default option**, while maintaining the possibility for military authorities to use regular customs procedures when necessary. It also provides for a structured exchange of information between customs and military authorities through a mandatory and regularly updated list of national customs contact points, ensuring access to all relevant facilitations and improved coordination across administrations. To further streamline military transport, the Regulation foresees specific provisions, ensuring that related **customs controls are treated with priority**. The digitalisation of EU Form 302 would also contribute to modernise and facilitate its use.

Rail and Air transport

At the technical level, the Regulation mandates **cooperation with the European Union Agency for Railways (ERA)** to review existing European railway technical and operational rules, identifying changes that can further facilitate the transport of dangerous goods and abnormal cargo on the rail network. In particular, the Commission will review the **Rail Service Facilities Regulation** in 2026 to ensure it meets military transport needs. The Regulation would ensure **coherence with other relevant legislative files under preparation**, notably the forthcoming Rail Capacity Regulation and the revision of the Weights and Dimensions Directive, thereby avoiding conflicting requirements between civilian and military movements.

For military transport by air, the Joint Communication calls for an evaluation of the principles of Flexible Use of Airspace adopted in 2005 (Regulation (EC) 2150/2005) in a context of increased cross-border operations to ensure efficient dynamic reallocation of the airspace, making cross-border operations more efficient and responsive. The Communication also calls for a series of actions to enhance smooth cross-border operations by air. Firstly, a network of dual-use airports needs to be established to accommodate increased military operations. The existing TEN-T network of dual-use airports should be evaluated to ensure they have the necessary capacity, equipment, and capabilities to handle military operations. Upgrade funding could be provided through the Connecting Europe Facility (CEF). Furthermore, in order to facilitate moving through national sovereign airspaces without jeopardising or being jeopardised by civil traffic and minimising the impact on the flow of civil traffic as well, cross-border connection points will need to be identified with the aim of covering the whole of the EU (360° approach) and facilitating all possible military cross-border movements.

Core measures on rules and procedures

- **Unified cross border permission procedures (standing and *ad hoc* permissions)**: Standardised EU templates and workflows for movement requests/notifications; maximum three-day processing time; clear responsibilities and timelines for competent authorities.
- **Dangerous goods and abnormal loads**: Common EU rules for military transport of dangerous goods and oversized/overweight consignments; advanced route planning based on infrastructure compatibility and coordinated traffic management.
- **Clarified customs procedures**: Default use of EU or NATO **Form 302** (unless otherwise requested by the military authorities when they favour the use of the standard customs declaration); prioritised controls; legal clarity already provided under the UCC for movements under official military use.
- **Adaptation of civilian rules to military needs:** exemptions for military transport from certain rules and restrictions related to traffic bans and cabotage

European Military Mobility Enhanced Response System (EMERS)

The preferred policy option laid out throughout the Military Mobility package also entails an ambitious approach when it comes to emergency situation requiring effective military transport operations.

Purpose and activation

The consultation revealed a strong consensus among Member States and industry stakeholders on the importance of establishing a common understanding of "military transport emergency", which should be paired with dedicated rules to facilitate seamless military movement and promote a coordinated approach across all Member States.

The **European Military Mobility Enhanced Response System** (EMERS) proposed under the regulation would introduce an **emergency framework** that could be activated by the Council of the European Union, based on a proposal from the Commission. The goal would be to address scenarios where a significant surge in military transport operations cannot be accommodated within the normal transport rules or the existing capacity of the Union's transport network. The heightened demand for military transport could result from various factors, including the deterioration in the Union’s security environment, external threats, or crises in neighbouring countries, as well as natural disasters or man-made catastrophes affecting EU Member States or third countries.

EMERS would apply to all Member States, and would entail **exceptional, time-bound measures** that temporarily override normal rules and procedures. The measures would aim to enable rapid, coordinated, and adaptable military movements in response to urgent situations, thereby facilitating the swift and effective execution of increased military transport operations.

By facilitating Member States' rapid deployment of military personnel and equipment, EMERS would **contribute to the credibility of the defence readiness of the Union**. In practice, the Council could take the decision to activate EMERS to enable swift and large-scale military movement in an effort to demonstrate a strong deterrence posture. As a result, while the EU and NATO could engage in exchanges of views regarding EMERS activation, Member States with EU and NATO membership would bear primary responsibility for ensuring consistency between NATO's military transport efforts and the potential EMERS activation.

EMERS activation and scope

- Commission can decide to or can be requested by 2 Member States to assess the need to activate EMERS. The assessment is based on a defined criterion (increase of military transport operations exceeding normal transport capacity and rules)
- Activation of EMERS by the Council, based on the Commission's proposal, following its assessment of the Commission.
- EMERS applies to the whole EU territory and has a clear time limit of activation extension and early termination can be decided by the Council.
- EU-NATO exchange of views could take place to ensure consistency and synergies

Enhanced facilitation of military transport

Once activated, EMERS would allow for the implementation of measures that would significantly facilitate Member States' military transport operations:

- military transport requests to be **automatically accepted** by the receiving Member State, subject only to a simple notification.
- Lead times for coordination and traffic management would be **reduced**,
- military movements across all transport modes would receive **priority access to transport networks, infrastructure and services**. This proposal was supported by nearly 59% of Member States during the consultation.
- To reflect operational urgency, Member States would also have to temporarily lift national restrictions on **cabotage**, **driving time** and **rest periods**, and **restrictions** based on noise control and air pollution in ports and airports for military transport operations, as well as the environmental performance of vehicles for certain road sections.
- Infrastructure managers may also authorise rail vehicles to operate **beyond their specified area** of use.
- The **protection** of Strategic Dual-use Infrastructures (see 5.3.2) would also be reinforced, to make sure that Member States can access the relevant infrastructures to execute their military transports.

- Member States would also benefit from a **reinforced access to transport and logistics capabilities** registered under the Solidarity Pool (see 5.3.3), if the latter is established.

For military movement entering the EU territory, EMERS would also include an **emergency customs mechanism**. The latter would be developed by the EU Customs Authority in consultation with the Commission, which enables **accelerated clearance procedures** or, where necessary, **temporary suspension of the obligation for customs declaration for military transport**. Similar flexibilities would apply to sanitary and phytosanitary controls for food and feed destined for military use, including supplies for service animals, to avoid logistic delays at entry points. The framework ensures that the temporary measures adopted under EMERS remain compatible with the EU's internal market and legal order.

EMERS Core measures

- **Notification based system for cross border movement** with specific conditions for transport where traffic arrangements are needed; accelerated coordination for road and rail arrangements.
- **EU-wide priority access** to infrastructure, networks and related services for all military modes and operators, including contractors and transport involving dangerous goods/abnormal cargo.
- **Enhanced regulatory flexibilities**: temporary exemptions from cabotage, driving and/or rest time, traffic limitations; permission for rail vehicles to operate outside their specified area of use.
- **Customs emergency protocols and Sanitary and phytosanitary (SPS) facilitation**: activation of a dedicated customs crisis protocol; temporary waivers for military food supplies (including for service animals) to avoid bottlenecks at entry points.
- **Enhanced protection measures** for strategic mobility infrastructure (physical and cyber), ensuring coherence with existing regulatory frameworks, in particular the CER and NIS2 Directives.
- **Enhanced access to capabilities** through the solidarity pool

5.3.2 On Infrastructure

Member States' armed forces heavily rely on dual-use infrastructures to facilitate their military operations. To ensure the readiness of these infrastructure networks, two sets of actions have become crucial: further upgrading and adapting our existing infrastructure, as well as strengthening the resilience of the most strategic dual-use infrastructure from potential threats. Member States' armed forces should also be able to rely on resilient and secure energy infrastructure to guarantee a stable energy supply, thereby ensuring the

uninterrupted mobility of their forces. These actions are reflected in the preferred policy option.

Reinforcing the dual use infrastructure network

The Regulation aligns the adaptation of the TEN-T to military requirements with the objectives of the future CEF (the Commission's proposal for the next MFF 2028-2034 promotes a tenfold increase of the available budget for military mobility, with a proposed budget of EUR 17.65 billion under the future CEF for investments in TEN-T dual-use transport infrastructure). Funding will focus on **upgrading the four priority military mobility corridors to standards consistent with the Council's Military Requirements.** Approximately **500 "hotspot**" projects have already been identified for urgent implementation, addressing key bottlenecks along these corridors.

In 2026, the Commission will launch a **study to reassess the real physical limitations of the rail infrastructure on the priority military mobility corridors** (working closely with rail infrastructure managers) to identify technical limitations and guide the selection of dedicated high-load routes suitable for the heaviest military vehicles. The Commission will also work to accelerate ongoing studies on the assessment of the state of rail and road bridges and tunnels and on an analysis of port and airport capacities by using satellite data. Work with the EU Member States and industry will ensure that the design of future military vehicles takes into account the physical constraints of the transport network. Efforts will also be taken to re-evaluate the transport infrastructure standards contained in the Council Military Requirements.

Enhancing the resilience of strategic dual-use infrastructure

Resilience measures will also address systemic vulnerabilities. The Joint Communication announces that the Commission will work with ERA to strengthen the robustness of the rail traffic management system in a harmonised way to ensure continued operations in cases of sabotage or other system failure. It will promote **absolute safe train positioning technologies** based on satellite signals, reducing dependency on physical trackside equipment. **Coordinated stress-testing processes** will be put in place by 2029 to facilitate this.

Complementing the obligations of Member States under the CER Directive, the **Regulation sets up a process for Member States to identify strategic dual-use infrastructure .** Based on a shared toolbox of resilience and protection measures that go beyond the instruments of the CER Directive, Member States will be able to ensure that this strategic transport, energy and communication infrastructure is resilient against threats and hazards and remain operational at all times. As announced in the White Paper for European Defence-Readiness 2030, this includes stronger measures to mitigate risks associated with foreign ownership and control of strategic infrastructure, as well as the possibility for Member States to temporarily take control over important infrastructure, equipment and assets.

Cybersecurity is an integral component of resilience. In particular, **comprehensive action at EU level** is needed to enhance the robustness of the radio spectrum that is at the heart of transport communication and navigation. The Commission, , will assess the need to update relevant EU legislation adapt essential requirements for radio equipment and accelerate projects for enhanced monitoring of radio frequency interferences.

By setting out cybersecurity risk-management requirements for essential and important entities in 18 critical sectors, the NIS2 Directive strengthens the cyber resilience of EU infrastructure. When implementing cybersecurity protection measures for SDI, it is necessary to ensure coherence with the measures taken pursuant to the NIS2 Directive and other relevant existing legislation. Besides the NIS2 Directive, Union legal acts in fields such as energy[58] and aviation[59] set out further cyber and information security requirements for certain types of entities in the relevant sectors.

Ensuring energy supply

Energy resilience is equally vital for sustained military mobility. The Regulation foresees coordination with the forthcoming reviews of EU energy security legislation, including the Oil Stock Directive, to ensure adequate access to critical fuel reserves and to integrate the defence dimension into the deployment of sustainable aviation and maritime fuels.

The Sustainable Transport Investment Plan will be an important milestone further supporting the scale-up of SAF and sustainable marine fuels. Closer cooperation between civil and military sectors in the fuel ecosystem can significantly unlock the potential of SAF and sustainable marine fuels markets, reinforcing EU energy security while pursuing climate targets. By promoting a modular, dispersed production model and enhancing distribution networks, the EU can reduce dependence on foreign fuels and fortify military mobility and operational readiness.

Such investment will present a significant opportunity to progressively enhance energy security and strategic autonomy for the armed forces of Member States. However, it is essential to note that pursuing an ambitious approach to renewable and low-carbon fuels, along with investing in the development of a comprehensive network of recharging and refuelling infrastructure, must be balanced with the Union's objective of maintaining military mobility. This is due to the fact that the existing transportation and logistical assets currently used by Member States' armed forces will remain in operation for many years to come, necessitating the continued availability of supporting infrastructure to provide them with the necessary fuel supplies.

Core measures on infrastructure adaptation

[58] See Commission Delegated Regulation (EU) 2024/1366 supplementing Regulation (EU) 2019/943 of the European Parliament and of the Council by establishing a network code on sector-specific rules for cybersecurity aspects of cross-border electricity flows

[59] See Commission Implementing Regulation (EU) 2023/203 of 27 October 2022 laying down rules for the application of Regulation (EU) 2018/1139 of the European Parliament and of the Council, as regards requirements for the management of information security risks with a potential impact on aviation safety for organisations covered by Commission Regulations (EU) No 1321/2014, (EU) No 965/2012, (EU) No 1178/2011, (EU) 2015/340, Commission Implementing Regulations (EU) 2017/373 and (EU) 2021/664, and for competent authorities covered by Commission Regulations (EU) No 748/2012, (EU) No 1321/2014, (EU) No 965/2012, (EU) No 1178/2011, (EU) 2015/340 and (EU) No 139/2014, Commission Implementing Regulations (EU) 2017/373 and (EU) 2021/664 and amending Commission Regulations (EU) No 1178/2011, (EU) No 748/2012, (EU) No 965/2012, (EU) No 139/2014, (EU) No 1321/2014, (EU) 2015/340, and Commission Implementing Regulations (EU) 2017/373 and (EU) 2021/664; Commission Delegated Regulation (EU) 2022/1645 of 14 July 2022 laying down rules for the application of Regulation (EU) 2018/1139 of the European Parliament and of the Council, as regards requirements for the management of information security risks with a potential impact on aviation safety for organisations covered by Commission Regulations (EU) No 748/2012 and (EU) No 139/2014 and amending Commission Regulations (EU) No 748/2012 and (EU) No 139/2014.

- The **Commission's proposal for the next MFF** (2028 – 2034) promotes a **tenfold increase** of the available budget for military mobility, with a proposed budget of **EUR 17.65 billion under the future CEF for investments in TEN-T dual-use transport infrastructure.**
- **500 hotspot projects on military mobility corridors** earmarked for near-term removal of choke points; regular corridor meetings to synchronise and accelerate implementation.
- **2026 rail study** to reassess physical limits (axle loads, gauge, clearances) of rail infrastructure; progressive identification and upgrade of dedicated high-load routes.
- **Review of Council Military Requirements** with EUMS; engagement with industry to optimise asset design against practical constraints.

Core measures on system robustness and cybersecurity

- Strengthening the robustness of the rail traffic management system in a harmonised way to ensure continued operations
- **Strategic dual-use infrastructure** identification by Member States, with an EU toolbox of protective measures complementing the CER Directive; mitigation of foreign ownership/control risks and provision for temporary public control where necessary.
- **Cyber/radio-spectrum resilience**: coordinated actions to strengthen the resilience of the air traffic management system and enhance monitoring and protection against interference, in particular of the radio spectrum.

Core measures on energy security for mobility

- Revision tracks for energy security legislation (including the **Oil Stock Directive**) to reflect defence demand, sustainable fuels and emergency access to critical stocks.
- Support for **Sustainable Aviation Fuels** and **Sustainable Marine Fuels**; coordination with NATO on future fuels and infrastructure trajectories.

5.3.3 On capabilities

Ensuring the effectiveness of military mobility relies heavily on Member States' access to necessary transport and logistics capabilities. To achieve this, it proposed under this preferred option to ensure that Member States' armed forces can count on enhanced cooperation through the sharing and pooling of capabilities, as well as on a robust civil-military cooperation, to facilitate seamless and efficient operations.

<u>Pooling and sharing capabilities</u>

Member States are confronted with significant gaps that are *de facto* difficult to bridge at the national level alone, either due to the substantial investment required or because addressing them individually would result in unnecessary duplication of efforts. To overcome this, several Member States have successfully implemented 'pooling and sharing' initiatives for transport and logistical capacities, notably in the field of strategic air lift, inland surface and sea transport. However, these initiatives are fragmented and limited to certain Member States. The Union also has relevant experience in pooling and coordinating responses to assistance in civil protection area through the European Civil Protection Pool.

During the consultation, Member States have expressed broad support for the concept of pooling and sharing dual use transport capabilities, with around 70% agreeing that it would be beneficial for military mobility and preparedness. While there are conditions and frameworks that need to be established to ensure the success of such an initiative, many see it as a way to increase transparency, boost interoperability, and reduce duplication of efforts within the EU. Overall stakeholders consulted also identify the potential for cost savings and enhanced readiness but recommend however the development of a flexible pooling model with clear allocation rules and centralized management.

Building on this, the Regulation would entail the possibility to establish a "Solidarity Pool" for military mobility. It would cover capabilities across all transport modes and seek to make them accessible to all Member States. The Commission would ensure that the solidarity pool can benefit from a 24/7 capacity as well as planning and coordination functions. Under this initiative Member States would be able to voluntarily register their own military transport capacities as well as those contracted with civilian operators. The registered capacities would be made available to all Member States, enhancing their ability to conduct military transport operations.

Additionally, the Union would be able to register additional capabilities in the pool and include contracted capabilities. To expand existing capacities, and to incentivise the sharing and pooling of capacities, the Commission should also respectively support procurement of new military mobility capabilities and help Member States in sharing the burden of deployment costs, maintenance expenses, and personnel training costs linked to pool. The proposed European Competitiveness Fund (ECF) includes dedicated provisions that would allow the programme to provide such financial support under the next MFF.

To complement the financial support, the Commission could also consider introducing a credit-based system while establishing the Solidarity Pool, to incentivize the sharing of capabilities among participating members. Building on the existence of the Air Transport, Air-to-Air Refuelling, and other Exchange of Services (ATARES) and the Surface Exchange of Services (SEOS), the Commission, may specify the conditions under which a credit-based system may be used as a form of non-financial exchange mechanism for capabilities registered in the Pool. Such a system could help to guarantee a fair and transparent access to the Pool's capabilities. Complementing this, a **Strategic Lift Reserve** will enable operators to set aside transport capacities (such as airlift or sealift) for EU or Member State use in exceptional situations.

<u>Civilian-military capacity enablement</u>

Member State's armed forces must be able to rely on a strong partnership with civilian actors. In this perspective increasing the awareness of the logistics and transport dual-use

capacities from the civilian sector constitute a prerequisite That the preferred option is aiming to achieve.

This is the reason why, the Commission and the High Representative will explore the possibility to create a **Military Mobility Catalogue** to allow European companies to voluntarily list transport assets and services that can support military operations, giving Member States' armed forces greater visibility of available capacities. Complementing this, a **Strategic Lift Reserve** will enable operators to set aside transport capacities (notably airlift and sealift) for EU or Member State use in exceptional situations.

Member States should also be able to access information about existing dual-use capabilities to appropriately plan future military transport operations and identify persisting capability gaps. Most civilian rail and road vehicles and aircraft are registered in national or European registers. Member States' visibility over existing capabilities should therefore be improved by ensuring that the national services responsible for military transport have access to these registers. Large numbers of civilian rail vehicles might be considered dual-use and fit for military transport operations, or easily upgradeable for those purposes. Therefore, the Commission should be allowed to define whether and under what conditions entities that own such vehicles, vehicle keepers that are responsible for them and vehicle manufacturers that manufacture them assess whether railway vehicles have the technical characteristics to be used as part of a military transport. The Commission should also be allowed to develop harmonised technical parameters on which such identification might be based.

Member States need access to information on existing dual-use capabilities. This could be achieved by granting national military transport services access to national and European registers of civilian vehicles, including rail and road vehicles, as well as aircraft. In particular, many civilian rail vehicles could be suitable for military transport or easily upgradeable for this purpose. To facilitate this, the proposed Regulation could allow the Commission to establish criteria to help railway undertakings, vehicle keepers, and manufacturers identifying dual-use railway vehicles.

As a result of scarce capacities, a Member State may end up **pre-contracting** those already booked by another Member State. To address risks associated with such possible double booking, we propose today that transport providers be required to keep Member States informed of such cases. In addition, to be ready to face most extreme situations, Member States should all have in place a framework for **taking temporary control of necessary equipment for military transport operations** also to assist other Member States.

Furthermore, to promote interoperability, the Commission will task its relevant regulatory Agencies (EASA, EMSA and ERA) and the European standardisation organisations to develop dual-use standards for military mobility critical transport assets, ensuring consistency with NATO standards for transport assets and the updated dual-use infrastructure requirements.

The Package also supports the use and **development of dual-use unmanned aircraft systems for military transport**. It notably calls for an EU network of civil/defence drone

testing centres. Together with the European Union Aviation Safety Agency (EASA), the Commission will develop a joint framework for integrating drones into low-altitude airspace and develop a U-Space framework, ensuring civil and military operations through common standards and procedures. It will create a European regulatory framework for Counter-UAS technologies and work on establishing a methodology for assessing AI-based drone systems' trustworthiness. Lastly, the Commission and EASA will develop a harmonised certification framework for large, high-risk drones by amending the EASA Basic Regulation. In close cooperation with the EDA, the Commission and EASA will ensure that **defence requirements and interoperability aspects are fully integrated into these initiatives**. EDA will act as the defence interface, linking national Ministries of Defence, facilitating access to military test ranges, and ensuring coherence with EU defence capability priorities and NATO standards.

Digitalisation of military mobility

Digitalisation constitutes a key enabler of preparedness. The Regulation therefore would envisage the creation of a **Military Mobility Digital Information System**, a secure, EU-wide platform for managing cross-border movement requests. This system would also have in scope the electronic handling of EU Form 302.

It would be designed to meet the highest standards of confidentiality and cybersecurity, with funding and deployment foreseen under the next Multiannual Financial Framework. This reflects a wide perception noted during the stakeholder consultation: 69% of Member States supported the establishment of a digital tool for cross-border permissions.

This option of a Military Mobility Digital Information System would build on the experience gained through the EDF's SDMMS project and could benefit from additional EU support under the next MFF, under the proposed ECF, which entails the possibility to fund the digitalisation of Military Mobility related processes. The development and deployment of the Military Mobility Digital Information System would also require a strong involvement of the Military Mobility Transport Group notably to reflect Member States views (see 5.3.4).

Core measures on solidarity mechanisms

- **Military Mobility Solidarity Pool**: sharing and pooling of registered national and EU capacities
- **Incentives:** EU co-funding of operating/maintenance/training costs; co-funded capacities automatically available to the Pool under EMERS; credit-based system to ensure fair use.

Core measures on civilian-military capacity enablement

- **Military Mobility Catalogue:** voluntary listing by European operators of assets/services relevant to military mobility.
- Access to **registries of dual-use road/rail vehicles** and identification rules to facilitate their military use.

- **Flexible and transport contracting:** transparency on overbooking; clauses enabling other Member States to access contracted services where feasible.
- **National frameworks for temporary control/right of use:** common minimum features to enable last-resort mutual support.
- Mandates to European **standardisation organisations** for **dual-use standards** (consistent with NATO).
- **Drone ecosystem:** EU civil-defence testing network; U-Space integration; Counter-UAS framework.

Core measures on digitalisation

- **Military Mobility Digital Information System** covering: digital workflows for movement authorisations; the customs aspects of EU Form 302; secure data exchange; NATO-interoperable architecture; high cybersecurity and confidentiality.
- **Development and deployment** envisaged under the next MFF, building on previous achievements (among others, the EDF's SDMMS); technical specifications co-created with Member States.

5.3.4 On governance

The preferred policy option establishes a strong governance framework in the context of the proposed the Regulation, ensuring a more cohesive approach to improve military transport in the Union.

At national level, each Member State will designate a **National Coordinator for Military Transport**, responsible for ensuring interministerial coordination. It would also act as the sole contact point in implementing the Regulation, particularly in facilitating timely and effective communication between Member States regarding cross-border permissions, where rapidity, efficiency, and clarity are essential.

At Union level, the Regulation establishes a **Military Mobility Transport Group**, bringing together representatives of Member States (incl. from Member States' customs authorities), the Commission, the European External Action Service (including the European Union Military Staff), and the European Defence Agency. This Group would provide a forum to advice and issue recommendations necessary for the implementation of the Regulation. For instance the Group would help identifying the capabilities that should be pooled and shared in the context of the possible Solidarity Pool or would provide recommendations on the technical specifications that should be envisaged for the potential Military Mobility Digital Information System. This Group would also play a key role in ensuring overall coherence and stimulating the coordination efforts at the Union level in certain aspects of the implementation of the proposed regulation. Specifically, the Group would encourage the establishment of standing permissions between Member States along

the same military mobility corridors, and promote discussions on pre-planned traffic arrangements and pre-defined routes in the context of these stranding permissions.

In addition, to maintain operational readiness, each Member State will conduct an annual **Military Transport Readiness Check**, to verify that it has implemented all necessary measures to facilitate military transport operations on its territory, and that it has shared its cross-border military transport permission requests and solidarity pool support requests in a timely manner. This will enable Member States to regularly assess that all necessary steps are being taken to ensure seamless military transport operations within the Union, with a view to maintain the credibility of the Union's defence readiness. In parallel, and as part of these preparedness efforts, the Commission and EEAS will organise **targeted stress tests** focusing on specific elements of the Regulation, such as customs control or civilian-military coordination.

Core measures on governance and coordination

- **National Coordinator for Military Transport** appointed by each Member State to ensure whole-of-government coordination and EU interface, including during EMERS.
- **Military Transport Group** (Member States, Commission, EEAS/EUMS, EDA) to advice the Commission on the implementation of certain aspects of the Regulation, promote permissions and traffic arrangements, and oversee progress.
- **Annual Military Transport Readiness Checks** by Member States.
- **Commission-led stress tests** on targeted aspects (e.g. customs procedures, civil-protection/military interfaces).

6 IMPACTS OF THE PREFERRED POLICY OPTION?

It should be noted that the **feasibility** of a **comprehensive *ex ante* assessment of impacts in the area of military mobility** is seriously **constrained in comparison with many other policy areas.** This limitation is driven primarily by the lack of available and/or reliable data due to the nature of and number of policy areas related to military mobility as well as and the security considerations and sensitivities associated with data sharing and making data publicly available. Beyond sensitivity of the data, there are no sufficient studies conducted in military mobility since the first Action Plan on Military Mobility and the newfound interest in the wake of the changing geopolitical situation. In addition, no sufficiently large-scale military transport movements have been performed previously. There is, therefore, a lack of evidence of formalised analysis of lessons learned from military exercises[60]. These limitations compound the speculative character of many of the assumptions in this chapter.

The measures laid out in the Military Mobility Package 2025 can be expected to have significant and multi-dimensional impacts on rules and procedures, infrastructure, and capabilities across the EU. The heterogenous nature (effect will not be uniform across the EU) and the conditionality (dependence on uptake) of many of the impacts described in this section should be noted. The analysis below considers direct, indirect and spill-over effects across the economic, social and environmental dimensions, and identifies (where possible) potential negative externalities and (where possible) mitigation measures.

6.1 Economic impacts

The Regulation establishes, for the first time at EU level, a **systematic framework for identifying and protecting strategic infrastructure for military mobility**. In operational terms, the vulnerability to disruption of such infrastructure has been underlined both in recent EU risk assessments[61] and during NATO's multinational exercises such as DEFENDER-Europe.[62]

The **infrastructure dimension** represents the **largest economic multiplier of the initiative**, taking into account the proposed **budget of EUR 17.65 billion CEF** (2028–2034) for TEN-T dual-use transport infrastructure upgrades along the corridors. It can be expected that this investment might enhance TEN-T network efficiency by removing bottlenecks and enabling interoperability of civil and military transport and increase cross-border connectivity and cohesion, especially for peripheral regions linked to those upgraded corridors.

However, this impact can be **expected to be unevenly distributed**: Member States with advanced project pipelines may absorb a disproportionate share of funding, (with the potential for widening intra-EU regional disparities). In Member States with extensive networks already subject to EU or national resilience measures, the incremental effect may be limited, whereas in others the identification of strategic dual-use infrastructure could lead to tangible improvements in preparedness.

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[60] ECA Special Report 04/2025, p. 58, p.63.
[61] Directive (EU) 2022/2557 of the European Parliament and of the Council of 14 December 2022 on the resilience of critical entities and repealing Council Directive 2008/114/EC
[62] U.S. Army Europe and Africa Public Affairs Office, DEFENDER 25

The foreseeable impacts on infrastructure are likely to materialise gradually and unevenly across the EU. The designation of strategic dual-use infrastructure is expected to **improve prioritisation of investment and protection measures** (it is to be expected that, once designated as such, this strategic dual-use infrastructure will focalise investment, subsequently receiving special attention from Member State governmental bodies when it comes to protection measures), but the degree of impact will depend on the consistency with which Member States apply the designation criteria.[63] Whereas largescale military movements may have disruptive effects on civilian life and require societal buy-in, their deliverables also benefit society. Investment in transport infrastructure could be of triple use, simultaneously benefitting the EU's trade flows, the EU's Common Security and Defence Policy and NATO's Concept for the Deterrence and Defence of the Euro-Atlantic Area[64]

As a recent European Parliament Research Service briefing insert states, "looking at the impact on GDP of the announced investment in dual-use transport infrastructure, it is essential to distinguish what would constitute new investment from what would constitute a shifting from the transport budgetary line to the dual-use military budgetary line. Budgetary realignment is important for flagging priorities and directing investment towards certain goals, but it is unlikely to boost GDP in a significant way as the total amount invested is unchanged." [65]

The mentioned briefing estimates the "potential impact of additional investment of between EUR 75 billion and EUR 100 billion until 2035 to inprove the current state of infrastructure [...] the added value associated with a larger amount of funds invested collectively leads to benefits that are almost three times higher (EUR 21 billion additional GDP per year in 2035) than when Member States invest separately and in an uncoordinated way." As a comparative exercise, the impact assesment on the completion of the TEN-T network sheds light on the following (building on the projects along the core network corridors to be implemented between 2017 and 2030):

- An additional **800 000 European** people will be **employed** in 2030 through the completion of the TEN-T core network,
- **7.5 million person-years of jobs** will be generated cumulatively during the period 2017 - 2030, The impact of TEN-T completion - Synthesis 10
- **Additional GDP growth of 1.6 %** will be realised in 2030,

Since there is a 94 % overlap between the EU military mobility network and the TEN-T network[66], it can only be assumed that infrastructure improvements on the TEN-T network would also benefit military mobility, creating significant returns and positive impacts.[67]

The results of the EPRS projection "confirm the largely beneficial impact of coordinated EU action when it comes to investment in infrastructure. The larger amount of funds

[63] European Association for Forwarding, Transport, Logistics and Customs Services, Position Paper on Military Mobility and Dual-Use Transport Infrastructure, July 2025.

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[64] NATO's "deter and defend" concept.

[65] European Parliament Research Service, European Added Value in Action briefing *"Towards a comprehensive and beneficial approach to military mobility"*, September 2025, p. 11.

[66] ECA Special Report 04/2025, p 10.

[67] European Parliament Research Service, European Added Value in Action briefing *"Towards a comprehensive and beneficial approach to military mobility"*, September 2025, p. 3.

invested collectively, and the efficiency gains associated with sharing best practices and further harmonisation, leads to benefits which are almost three times higher (€21 billion additional GDP per year in 2035) than when Member States invest on their own (around €7 billion additional GDP per year in 2035)."[68]

Figure 7 : European Parliamentary Research Service's estimation of GDP impact per year by 2035, p.11.

Hence, upgrading of selected assets to dual-use standards may generate **efficiency gains for both civilian and military traffic** (although speculative, these could range from time savings, to cost reductions or capacity increases[69 70]), but the scope of such benefits will vary depending on national uptake. Reinforced bridges and upgraded railheads are expected to ease bottlenecks for heavy military convoys and could also facilitate the movement of oversized civilian freight, though such civilian spillovers will likely not be universal.[71]

The earmarked near-term removal of choke points in the 500 hotspot projects, can be expected to **reduce the vulnerability of key assets to disruption, particularly in relation to hybrid threats**. However, the impact will depend on the adequacy of resources allocated to upgrading measures, as well as on the ability of operators to integrate new standards into existing systems. Some operators, especially in ports and rail, may face significant costs in meeting the new requirements

The revision tracks for **energy security legislation** (including the Oil Stock Directive), support for SAF and sustainable marine fuels, and coordination with NATO on future fuels and infrastructure trajectories is likely to improve security of supply for military transport, especially on the EU's eastern flank where refining capacity is more limited. Nevertheless, the effect may be constrained by structural trends in the energy market, such as declining refining capacity in the EU. Access to emergency oil stocks in crises may improve operational readiness, though this may come at the cost of temporary strain on civilian markets if not adequately managed.[72 73]

The military mobility package is also expected to yield gradual yet significant changes to military mobility within when it comes to **rules and procedures** in the EU. Even though

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[68] European Parliament Research Service, European Added Value in Action briefing *"Towards a comprehensive and beneficial approach to military mobility"*, September 2025, p. 11.
[69] European Parliament, *Implementation Appraisal Briefing, European critical infrastructure Revision of Directive 2008/114/EC,* February 2021.
[70] European Commission: Directorate-General for Research and Innovation, *Making the most of EU research and innovation investments – Rethinking dual use*, Publications Office of the European Union, 2025.
[71] European Parliament Research Service, *Increasing European added value in an age of global challenges Mapping the cost of non-Europe in 2022-2032*, February 2023.
[72] European Commission *Staff Working Document on the Mid-term evaluation of Council Directive 2009/119/EC imposing an obligation on Member States to maintain minimum stocks of crude oil and/or petroleum products {SWD(2017) 439 final}*, dated 24.11.2017.
[73] European Commission: Directorate-General for Energy and Trinomics, *Impact assessment "Measures resulting from the mid-term evaluation of the Oil Stocks Directive 2009/119"*, Publications Office, 2019.

difficult to quantify, the foreseeable impact is expected to positively affect the **time and uncertainty** associated with **cross-border movement permissions and customs.**

For example, according to the ECA Special Report 04/2025, some Member State requires 45 days advance notice for cross-border movement of military equipment during peacetime.[74] [75] Brig. Gen. Fabrice Feola, who commands France's Centre for Operations and Transport Support, affirmed that "obtaining approval to cross neighbouring countries by military convoy today takes much longer than a European Union target of five days – more like tens of days".[76]

In the consultation, Member States's respondents underlined that a binding framework for TAs could **drive standardisation and simplification,** thereby accelerating the cross-border transport of troops and military equipment. At the same time, concerns were raised that some Member States may be reluctant to abandon established national procedures and requirements. Nevertheless, to achieve efficiency and interoperability, uniform technical standards are required across all corridors intended for military mobility. A commonly accessible digital platform was suggested as a practical tool to support this objective. Member States also recalled the importance of EDA's Category A programme on "Optimising cross-border movement permission procedures in Europe" (CBMP) and stressed the importance of its full implementation.

Industry stakeholders echoed these points, noting that while full harmonisation is feasible in certain Member States, practical challenges may persist elsewhere even under a harmonised legal regime. Such challenges include digitalisation gaps, language barriers, and coordination difficulties with civilian authorities. Industry therefore stressed that EU-level harmonisation must be operationally viable and more practical than existing arrangements, while allowing for some flexibility to accommodate specific national circumstances. Despite these caveats, harmonisation was broadly recognised as a means to reduce bureaucratic burdens and create standardised procedures for cross-border movement.

By introducing common timelines and standardised templates for movement permissions, and ensuring that all the customs facilitations related to Form 302 are used , routine military transport is likely to become more predictable, which in turn should facilitate more precise operational planning. However, the actual scale of this reduction will be largely dependent on the capacity of national administrations to adapt, the level of uptake, and the degree to which Member States enforce compliance internally.

The harmonisation of authorisation procedures across the EU can also be expected to create a **more stable environment for operators engaged in defence-related transport**. At present, divergent national approaches expose operators to different levels of scrutiny, liability, and delay. The Regulation is expected to reduce this variability over time, thereby improving legal certainty. Easening the administrative burden and the need for intermediaries to handle permits and clearances, would allow coordination centres and logistics operators to focus on optimizing routes, capacity, and timing - activities that add

[74] Rapid mobility of troops and equipment across the EU still 'problematic', say auditors | Euronews
[75] Red tape and underfunding slow down EU 'military Schengen'
[76] EU rail push to eastern flank still snarled by rules: French general

real efficiency rather than procedural compliance. The result would be faster, more cost-effective, and more competitive transport services supporting both defence and industry.

D**igitalisation** would represent a considerable **shift in how military mobility is administered**. The foreseeable impact at operational level may result in fewer errors, faster processing, and better situational awareness of traffic flows. At strategic level, this impact might translate into higher availability of aggregate data on movements, which may help the EU identify systemic bottlenecks and to refine policy responses. At the same time, risks are inherent: cybersecurity concerns are likely to remain (or increase, if parts of the process move to digital space), and processes to increase cooperation with NATO/the respective national systems will be likely technically complex. Furthermore, it is worth pointing that the benefits of digitalisation will only materialise if data is consistently and accurately input.

The codification of a common **definition of a "transport emergency"** and, especially, the activation of extraordinary derogations under EMERS are likely to **shorten the time needed to implement crisis measures**, compared with the current situation where national authorities rely on divergent, siloed procedures. The foreseeable impact is a more rapid synchronisation of responses across the EU, particularly in high-tempo reinforcement scenarios. However, this beneficial impact must be weighed against the risk that divergent national interpretations of when a "transport emergency" exists could persist, particularly in the first year of implementation. A further impact to take into consideration is the balance between derogations and safety/environmental standards: too broad or frequent use of derogations could undermine public confidence or civilian traffic safety.

The introduction of **priority access rules** across all transport modes is likely to have different impacts. For military transport, **improved planning of convoy movement during "transport emergencies**" for military planners and civilian operators is foreseeable, as operators would no longer face uncertainty about whether civilian flows take precedence. For civilian users, the impact is likely to be more mixed. In most cases, **disruptions would be temporary and limited** to periods of emergency. However, in congested transport systems (like major ports or key rail hubs), the diversion of capacities could produce noticeable domino effects. [77]

Coordination with NATO when it comes to documentation standards, is expected to **reduce duplication and ease the transit of Allied forces through EU territory**. The impact here will be most visible in large-scale deployments, where procedural bottlenecks currently create significant delays. The impact here will be most visible in large-scale deployments, where procedural bottlenecks currently create significant delays. However, the degree of improvement will depend on the consistent application of the harmonised standards in practice and on the level of EU-NATO coordination achieved.

The regulatory impacts of the package are expected to be positive in terms of reducing fragmentation, increasing predictability, and improving coordination with NATO; all seen as major concerns for Member States and industry alike in the stakeholder consultation. The impact will depend on the speed of national transposition, the adequacy of

[77] Community of European Railway and Infrastructure Companies, Position paper "Rail's Vital Role in Enabling the Future of EU Defence", *Ibid*.

administrative resources, and the willingness of all parties to align their practices with the new harmonised framework.

The harmonisation of cross-border authorisation or the implementation of simplified customs formalities may **increase efficiency, legal certainty and predictability for both military and civilian logistics operators.** Uniform templates and the three-day processing target will cut waiting times and remove the need for multiple, duplicative national authorisations.

Standardised procedures are expected to **reduce admninistrative costs for operators and authorities, likely generating costs savings**. Based on comparative evidence from the new Union Customs Code Regulation, administrative time savings are plausible[78] The digitalisation of EU Form 302 is expected to lead to a reduction in the documentary errors that may be expected in terms of market efficiency. In terms of increasing certainty for investments, predictable and harmonised rules make military mobility projects more bankable, which may encourage private investment in dual-use infrastructure projects.

Transitional costs that can be expected to have to do with necessary investments by Member States and operators in potential IT adaptation or compliance monitoring. The expected positive impact that the Regulation's measures may have on interoperability standards might serve as a mitigating factor of these possible transitional costs.

The foreseeable **economic impacts on capabilities** are likely to be gradual but significant in scope, particularly as the Regulation creates mechanisms for **transparency, pooling, and burden-sharing** that have so far been absent. The establishment of national and EU-level registries of dual-use transport assets may provide a clearer picture of available capacities. The expected impact can be expected to be an **improvement in planning and allocation of resources**: planners will be able to better match demand with available assets, better identify critical shortfalls, and better develop the appropriate contingency measures. However, the effectiveness of the registries will be impacted by the accuracy and completeness of the data provided by operators, as well as on the degree to which the information is kept up to date.

The **solidarity mechanism** is expected to **strengthen collective resilience.** For Member States with limited national transport capacity, the impact could be particularly meaningful, as they could gain structured access to assets otherwise unavailable to them. Member States with larger national transport capacities may benefit from burden-sharing arrangements that reduce the risk of overstretching their assets during crises. Nonetheless, the functioning of the solidarity pool will be impacted by depending heavily on voluntary contributions, clarity of allocation rules, and the governance structure ensuring fair and rapid access. Stakeholder survey input also reinforces the foreseeable risk that in situations of high civilian demand, the willingness of operators to release assets into the pool may be constrained.

The more structured integration of private carriers into the military mobility framework will likely **expand the volume of transport capacity available**, particularly in sectors

[78] Commission Staff Working Document, Impact Assessment Report accompanying the document Proposal for a Regulation of the European Parliament and of the Council establishing the Union Customs Code and the European Union Customs Authority, and repealing Regulation (EU) No 952/2013, {SWD/2023/140 final}.

such as road and rail freight where military-owned assets are limited. Clearer liability rules and pre-negotiated framework contracts should reduce the reluctance of companies to participate. The likely impact is that, during crises, reliance on private carriers will be more predictable and less vulnerable to last-minute refusals. However, this dependence also creates new vulnerabilities: private operators may still prioritise commercial commitments or be reluctant to operate in high-risk areas, even under a more robust legal framework. The Regulation reduces but does not eliminate these uncertainties.

The harmonisation of standards for dual-use equipment is expected to **encourage interoperability and reduce inefficiencies in procurement.** Over time, this may lower costs and simplify the use of civilian equipment for military purposes. The impact is likely to be gradual, given the long lifecycle of rolling stock and other transport equipment. However, industrial adaptation will depend not only on regulatory alignment but also on the strength of demand signals from both civilian and defence customers.

The capabilities pillar will **increase the availability of transport assets** (especially for Member States with limited capacities in this regard), being expected to lower overall costs and improving utilisation rates. Harmonised dual-use standards and certification frameworks for drones, vehicles and logistics systems may create **larger, EU markets for dual-use equipment, with an increased level of predictability**. These changes may impose **adjustment costs on SMEs** that must align with these new standards or interoperability requirements.

6.2 Societal impacts

Measures foreseen under the package will have both direct and indirect impacts on different societal aspects. It can only be expected that improved infrastructure will enhance mobility, safety and accessibility for both military and civilian users, benefiting citizens beyond the defencedomain. The process of identifying strategic dual-use infrastructure may further **strengthen resilience in crisis times and public safety.** Public perception risks may include concerns about **disruptions of public space**, especially during construction.

The introduction of priority rules under EMERS could, when activated, create **short-term disruption to civilian transport flows**. Such impacts are expected to be temporary and proportionate but will need to be closely monitored to avoid unintended consequences for supply chains. The activation of EMERS prioritisation protocols may also temporarily disrupt civilian transport and impose economic costs on operators, particularly if activated for extended periods. These risks to infrastructure underline the importance of adequate EU co-financing and coordinated monitoring.

In terms of governance, the establishment of the National Coordinators and the Military Transport Group will serve to **strengthen inter-ministerial coordination**. Stakeholder consultation responses revealed that the absence of uniform procedures currently causes a high degree of legal uncertainty.

The new governance mechanisms laid out in the Regulation promotes **accountability of the different bodies and agencies.** Potential downsides include an initial increase in administrative workload (including for Union agenies) particularly for Member States with less populous administrative bodies.

The Regulation is likely to have a **moderate but discernible effect on labour**, particularly in the transport and logistics sectors. The increased reliance on dual-use infrastructure and private operators for military transport will likely require a workforce with the necessary clearances, technical skills, and familiarity with military standards. A foreseeable impact may not be the creation of large numbers of new jobs, but rather the reskilling and upskilling of existing staff to ensure compliance with harmonised rules and procedures. This may be expected to, over time, reduce errors in handling dangerous goods or improve digital competence where new tools are introduced. The immediate impacts may be modest, as training systems take time to establish and absorb, but cumulative improvements in preparedness are likely in the medium to long term.

Labour shortages in key sectors (road haulage, rail freight) are likely to condition the Regulation's effectiveness. Stakeholder input highlighted that many truck drivers operating in Member States are nationals of other EU or third countries, which may present challenges in times of crisis if mobility is restricted or labour protections limit redeployment. This structural vulnerability means that the Regulation's reliance on private carriers could be constrained by availability of personnel, particularly during surges in demand. Overall, the Regulation is expected to have limited quantitative impact on employment levels, but qualitative impacts on skills, training requirements, or working conditions are foreseeable.

It can be expected that **enhanced capabilities contribute to preparedness, solidarity, and governance coherence.** This may be the case with National Coordinators and the Transport Military Group when it comes to the first steps of institutionalised cross-sectoral coordination at national and EU-level and the improved interinstitutional accountability that might be a consequence of this. The aforementioned readiness checks and stress tests can be expected to build trust and an operational culture across the bodies involved that may elevate the level of trust between them.

Nevertheless, the measures may introduce **potential governance complexity with the emergence of new coordination nodes.** The mitigation of this risk may potentially stem from the clear division of competences, reporting practices and peer-review informal processes (i.e. in the Military Transport Group)

6.3 Environmental impacts

Measures foreseen under the package will have both direct and indirect environmental implications.[79] At immediate level, facilitating more frequent and large-scale military transport may result in a **marginal increase in emissions associated with transport activities, particularly in the road and rail domains**. Although military transport represents a relatively small share of overall transport flows in the EU, the movement of heavy, outsized cargo and the use of older platforms are likely to generate higher per-movement emissions. **The long-term environmental impact will therefore depend on the scale of utilisation of the framework**, which will mainly depend on the evolution of the EU's security environment.

[79] Joint Communication to the European Parliament and the Council: *a new outlook on the climate and security nexus: addressing the impact of climate change and environmental degradation on peace, security and defence*, dated 28.6.2023.

Infrastructure adaptation measures may also have **localised environmental consequences**. Works could generate temporary increases in noise, emissions, and land-use pressure, depending on the scale of projects. Indirectly, the Regulation may contribute to improved resilience of transport and energy supply chain infrastructure, with positive spillover effects for the environment. Enhanced resilience measures, including those related to strategic dual-use infrastructure, are expected to reduce the vulnerability of critical infrastructure to disruptions, thereby potentially limiting inefficient fuel use and unnecessary emissions.

From an environmental perspective, the Regulation's reliance on existing TEN-T alignments minimises new land take, consistently with the "do not significant harm" principle laid out in Regulation (EU) 2020/852[80]. Positive impacts may range from **reduced overall vehicle mileage for heavy transports to updated design standards**. Negative externalities, however, may include **potential localised increases in noise levels, or natural habitat disruption** during construction periods. At EU level, there is no recent comprehensive estimate of adaptation costs available. Extrapolating from national assessment studies, the World Bank (2024) estimates a range of EUR 15 billion to EUR 64 billion for the annual aggregate (climate) adaptation costs for the EU27 countries until 2030.[81]

The impact assesment on the completion of the TEN-T network assessed that 26 million tons of carbon dioxide emissions will be saved between 2017 and 2030 in the transport sector. This is expected to be complemented by noticeable additional savings of carbon dioxide emission which will be enabled by further roll out of alternative fuel infrastructure (electricity, natural gas, hydrogen) and their use by cleaner vehicles. Given the 94 % overlap between the EU military mobility network and the TEN-T network[82], it can only be assumed that infrastructure improvements on the TEN-T network would also create similar returns.[83]

Smoother and shorter transport procedures can be expected to **reduce congestion and idle times at border crossings**, leading to (marginal) reductions in fuel consumption and air pollution. Harmonised route planning may prevent unnecessary detours (although subject to the needs of military planning), contributing to (marginally) better environmental outcomes.

Nevertheless, the **possibility of increased overall traffic flows**, especially during EMERS activation, could locally raise emissions and/or noise. This is offset by the Regulation's integration of sustainability considerations (i.e. focus on Sustainable Aviation Fuel) and its encouragement of exploring multimodal transport options, consistent with Better Regulation's enphasis on creating synergies with the European Gren Deal.

Another area of environmental impact concerns fuel supply: stakeholders highlighted the continuing dependence of armed forces on fossil fuels, which will persist even as civilian transport undergoes a gradual transition to low-carbon alternatives. In the medium term,

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[80] Regulation (EU) 2020/852

[81] Johannes Pfeiffer and Karen Pittel, *"To adapt or not to adapt: Costs, Benefits, and Financing of Adaptation in the EU"*, Ifo Institute, Policy Debate of the Hour series, p. 8.

[82] ECA Special Report 04/2025, p 10.

[83] European Parliament Research Service, European Added Value in Action briefing *"Towards a comprehensive and beneficial approach to military mobility"*, September 2025, p. 3.

this divergence could slow the uptake of renewable fuels in certain corridors if military requirements necessitate the maintenance of conventional fuel infrastructure. However, the Regulation also creates opportunities for incentivising dual-mode or dual-fuel assets, which could mitigate the impact over time if adequately supported by EU funding instruments. While the Regulation might generate **some localised and short-term negative environmental effects**, particularly linked to additional transport activity/infrastructure upgrades, it also has the **potential to deliver indirect efficiency gains and synergies with EU sustainable transport objectives**.

Capability pooling and emphasis on dual-use of the measures set out in the Military Mobility Package will, foreseeably, **reduce resource duplication**, with potential impact on the reduction of emissions stemming from this. The drone and counter-UAS frameworks introduced may have the long-term effect of **promoting safer and more efficient low-altitude logistics**, with potential civilian applications in disaster relief and environmental monitoring. Negative impacts could include **increased energy use** during high-readiness operations (or during EMERS activation) and challenges in the **environmental management of retired or requisitioned assets.**

ANNEX: STAKEHOLDER CONSULTATION (SYNOPSIS REPORT)

CONSULTATION STRATEGY

A targeted stakeholder consultation for the Military Mobility package aimed to collect **qualitative and quantitative data and feedback on key issues that ought to be addressed in the Military Mobility Package 2025**. The targeted consultation was launched on 12 June 2025 by a Joint Press Release by the European Commission and the EU's High Representative. It addressed Member States and all relevant actors including NATO, relevant PESCO projects, military mobility areas, industry, transport infrastructure and assets managers, customs and energy sector stakeholders and the financial sector among others.

This targeted stakeholder consultation encompassed a dedicated **online survey and possibility to submit position papers and written contributions** from 12 June until 31 July 2025. The EEAS and the European Commission were also conducting a dedicated consultation of Member States until 30 September 2025.

Finally, EDA has gathered expertise through its military mobility network and working groups and informed these about the consultation.

Given the specificities of the field of military mobility, requiring technical expertise and handling of non-public information, the targeted consultation strategy was selected instead of a public consultation. A call for evidence was open for public feedback on the Have your say portal for 24 October 2025.

In total, the Commission received **108 contributions** to the survey, of which 39 from Member States and 2 from Norway, 36 from companies, 12 from industry associations, 4 from other organisations. Other contributions included 12 from port authorities, 1 from rail authority and 1 representing workers and a contribution from NATO. With regards to sectors represented, where possible to provide a specific allocation, 6 originated from air sector, 3 representing customs authorities, 1 from energy sector, 21 from rail sector, 2 from road sector and 18 from sea domain. 76 position papers were also received in the consultation, 7 from Member States and 69 from industry, think tanks, and other organisations. Input was also received from NATO.

The bilateral meetings with the Member States who responded positively to the invitation provided an opportunity to further discuss and deepen the understanding of the written contributions provided and present the aggregate results of the stakeholder survey to Member States. In addition to the structured consultation process, Commission met bilaterally with those Member States who wished to avail of the opportunity to further discuss each of the thematic areas.

For the purposes of this document, given the minimal differences in perspectives between Industry Associations and Companies, we have grouped them into a single category labelled 'Industry.' Consequently, the analysis will focus on comparing findings between Member States and the Industry sector, unless there are differences.

Figure 8: Number of contributions received by stakeholder group

		Answers	Ratio
Member States		39	36.11 %
Companies		36	33.33 %
Port Authorities		12	11.11 %
Industry Associations		12	11.11 %
International Organisations		4	3.7 %
NATO		1	0.93 %
Norway		2	1.85 %
Workers		1	0.93 %
Rail Authorities		1	0.93 %
No Answer		0	0 %

The questionnaire was built around the following areas of interest: regulatory bottlenecks, transport capabilities, resilience of infrastructure and access to energy. Participants were asked **specific questions allowing for quantitative assessment of responses and open text boxes** providing them with a possibility to justify their answer or provide more information. A summary of the latter is presented together with further inputs from written contributions.

To present the results in an aggregated manner, but underlining differences between the different respondent groups, sections presented below refer to views of respondents from Member States and industrial stakeholders. Responses of other stakeholders from the less numerous groups are provided in general sections providing general views of all respondents to avoid the possibility of identification of a specific entity.

1. **Identified obstacles in military mobility**

In discussions on the main obstacles and causes of delays in military mobility that would have to be addressed as a matter of priority, there has been a broad consensus among stakeholders. The highest-ranking "invoked" causes were the **infrastructure problems or bottlenecks,** with 70.83% for Industry and 64.1% for Member States, and current paperwork, consisting of cross-border movement permissions and formalities, with 76.92% for Member States and 58.33% for Industry.

Many noted that the **insufficient capabilities and transport assets** (Member States 66.67%, Industry 45.83%), and **interoperability issues between civil and military systems** (Member States 48.72%, Industry 45.83%), also cause delays.

When asked about the areas that cause the biggest delays among these Member States consider **diplomatic clearances** and **time to obtain permissions for the transport of dangerous goods**. Industry similarly highlighted the **time to obtain permission for the transport of dangerous goods and permission for oversized or overweight cargo**. Generally, the **transport of dangerous goods** was found as cause of biggest delays to

obtaining specific clearances for both – annual movement permissions and *ad hoc* movement permissions.

Member States noted that the submission of incomplete or wrongly completed forms, along with the differing rules and restrictions for the transport of oversized and overweight cargo for various modes of transport causes further delays. Respondents mentioned that the present fragmentation causes preventable delays. As solutions to the above identified issues, respondents noted the need for a robust legal framework, harmonising requirements (i.e., pertaining to required diplomatic clearances, rules governing cross-border movements, information sharing) on EU level as much as possible. In line with this, suggestions were made for EU-NATO interoperability efforts to be enhanced, aligning the procedures, to ensure efficient cooperation between EU and non-EU NATO allies (i.e., rapid movement of military personnel arriving in EU from non-EU allied countries). Further digitalisation and electronic information sharing would have the potential to further reduce the delays caused by manual handling of the documentation. Some Member States would welcome the establishment of a Host Nation Movement Coordination centre at the MoD, as well as further investment into the infrastructure (including dual-use projects) and creating connections from hotspots, military bases, or storage areas to the nearest transport network node.

In their submissions, industry stakeholders have raised that in some cases the last-minute changes to routes, escorting of military transports, lack of digitalisation and automation in military transport, and lack of interoperability cause delays. When discussing solutions, industry stakeholders focused on the necessity of further investment (through Member States and available EU instruments such as CEF, SAFE, the next MFF cycle) and upgrading infrastructural facilities which have not been constructed with military use in mind to dual use standard, granting priority to military transport, strengthening the resilience of the supply chain and infrastructure security, introducing uniform signalling system for rail transport, and further digitalisation. The latter mostly pertains to cross-border permissions and customs formalities and reducing the differences in interpretation of the different rules and procedures among Member States customs authorities. Other areas were signalled as having a potential to limit delays: real-time route planning, tracking and communication (e.g. the creation of a digital twin for the corridors and routes has been suggested for rapid comparison of route options, impact assessment, infrastructural disruption or for identifying an alternative route in cases of external disruption). It was noted that issuance of permits for oversized military transportation should be prioritised.

With regards to information sharing, respondents found it fundamental to ensure a secure communication channel and governance structures to ensure coordination between Member States, military authorities and relevant stakeholders. It was also raised that exception for holiday and weekend traffic as well as for working hours for military transport would increase the speed of movements, as well as a greater number of trained personnel to operate the infrastructure.

2. <u>Regulatory bottlenecks</u>

2.1. Common definition of *Transport Emergency*

In discussions regarding the usefulness of **developing a definition of a** '***transport emergency***', **the majority** of both Member States and Industry agreed that a **common definition would be useful** (Q5: Member States 61.1% and Industry 50%) or useful under

certain conditions (Q5: Member States 33.33% and Industry 39.58%) and that it should be accompanied by a set of specific rules facilitating military movement applicable in such a case (Q6: Member States 87.81% and Industry 87.5%). Providing such definition at EU level was seen as important.

Overall, Member States were welcoming a common definition of a *transport emergency*, as it would help **reduce bureaucracy and legislative overlaps**. It would ensure that a state of emergency in one Member State is equivalent to that in other Member States and would **avoid differing interpretations** (n.b., if the concepts are interpreted identically with a unified emergency standard, then a unified response can also be adopted). Some Member States only welcomed this for times of security crisis or in escalation of events, noting that the exact wording is crucial in order to avoid an overly broad definition. Others noted that there might be a movement of larger formations already in peacetime, therefore transport emergency shall be developed as a tool to facilitate such movement, rather than become a new emergency state. Certain level of flexibility for unforeseen circumstances shall be maintained, however too broad of a definition might become redundant; national context should be considered. Some Member States further noted that specific rules applicable in transport emergency would be useful, as they would help accelerate military mobility. Such a set of common rules could provide legal certainty, reduce bureaucratic burden, legislative overlaps and contribute to faster reaction times. Ideally, it would promote further harmonisation among the Member States, as they would have a common framework based on which emergency measures would be taken. Some Member States were in favour of these rules being applicable also in peacetime, to facilitate the large-scale military movements (e.g., during environmental disasters). However, it was also noted that some Member States already have rules which can be used in case of an emergency, while others underlined that a country should be aware of the goods entering, transiting, and exiting its territory at any time.

Industry stakeholders likewise welcomed the common definition, for reasons that it would **facilitate decision-making, reduce administrative burdens, improve the overall coordination**, and offer more **legal certainty to operators**, highlighting the need of a precise wording to avoid misconceptions. A common set of rules would make certain operational situations easier to comply with and ensure that the response is more effectively coordinated, however, the infrastructure limitations must be taken into consideration. It would ensure efficient and timely movement of large quantities of troops and equipment across borders (n.b., through pre-established military corridors). The added value would allow for a seamless coordination with other organisations including with NATO, more efficient use of civilian and dual-use infrastructure, as well as allow for enhanced readiness and training (e.g., the pre-defined rules can be incorporated into the training exercises, simulations and readiness assessments).

2.2. **Transport of dangerous goods, and oversized and overweight cargo**

While cross-border permissions and rules for the transport of dangerous goods and oversized and overweight cargo are needed, their number at different levels should be limited to reduce redundancy to avoid causing unnecessary delays to military transport. The **relaxation of the rules for the transport of dangerous goods, oversized and overweight cargo by the armed forces was welcomed by the majority of both Member States and Industry**, (with 64.1% of Member States and 47.92% of Industry and 58.92% of Member States and 43,75% of Industry respectively in favour). However, such a

relaxation should be done in **cases pertaining to crisis or wartime** on the premises of speedy transport, rather than become a standard.

Member States highlighted that the relaxation of rules should come **under specific conditions** (e.g., having a declared state of emergency or a crisis), and should ideally **align across the entire conflict spectrum**, considering that the boundaries between peacetime, crisis and war time are not always clear. Others noted that a distinction should be made between dangerous goods and then ammunition and weapons – the latter two should be subject to notification. Some noted that armed forces should be able to transport the cargo in all situations, as having two or more sets of rules could negatively impact readiness, as forces would have to wait until the decision on the status of the situation would be made before being able to move. However, it was also raised that a minimum standard must be established and respected, considering the physical constraints of road infrastructure (e.g., bridges, tunnels, roads), as while the relaxation certain rules in times of crisis may be useful to enhance flexibility and responsiveness, it should never come at the expense of safety (i.e., consideration should be given to European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN) and Agreement concerning the International Carriage of Dangerous Goods by Road (ADR)). This was also raised by those Member States that were against such a relaxation, citing protection of population and fear of losing control over the goods entering the country.

Likewise, industry stakeholders in general welcomed the relaxation of the rules in crisis or wartime to offer **more operational flexibility, to act quickly and appropriately**. It was highlighted that the rules should be defined in advance, guarantee the necessary safety level, be harmonised on EU level, pre-tested and not leave space for interpretation or cause ambiguity, as that could delay or reduce the security of a cross-border transport. Clear distinction according to context should be maintained – during peacetime stricter rules should remain applicable. However, there may be structural restraints (e.g., bearing capacities of the bridges and quays) that should be respected in all circumstances. Additionally, there should be compensation for the wear and tear of the infrastructure caused by overweight and oversized cargo. Those that were against have raised the necessity to respect and maintain the rules intended to guarantee safety, environmental compliance, infrastructural integrity to mitigate possible risks. Instead of relaxing the rules, they have suggested to focus on the process.

2.3. **Private carriers**

Presently, there is a **broad reliance on private carriers for military transport**, due to the limited capacities within the armed forces, which underlines the need for a streamlined treatment to achieve operational continuity. The **majority of Member States** who had experience with military transports have stated that **that transport by private carriers for the armed forces are treated less favourably than ordinary military transports** (51.28%), while the **majority of Industry** stated that **they don't have practical experience with military transports** (45.83%), (and only about 20% of both categories of respondents reported that transport by private carriers for the armed forces are treated the same as ordinary military transports).

However, in some Members States more controls need to validate the transport done by private carriers, and that the movement of cargo by civilian means is treated as civilian movement. It was noted that there is a deviation between NATO, EU and national rules on

how the status of a civilian "contractor" is seen (it was suggested that if the contractor is delivering goods for armed forces, he should be treated as an operator of the armed forces). On the other hand, it was also raised by a Member State that civilian freight should not be treated the same as a military freight, upholding the obligation to comply with the stricter rules.

Some industry stakeholders raised that military transport should not be carried out by private companies, but rather public authorities, due to the very nature of the goods transported. This was mirrored in the claim that solely state-owned railway companies are suitable for such a task. However, more broadly it was noted that structured partnerships between Member States and private carriers should be established and operated on a *"trust-and-check" basis* mechanism, which would allow for a rapid activation of private carriers without jeopardising security of the transport.

2.4. Codification of Technical Arrangements and Priority Access

Member States recalled the EDA's Cat A programme on "Optimising cross-border movement permission procedures in Europe" (CBMP) and highlighted the need for its implementation. According to Member States, **codification of the Technical Arrangements into EU law would be a way to speed up implementation**. The most common expected result of the codification of Technical Arrangements into EU law would be the **full harmonisation of the procedures to obtain diplomatic clearances for cross-border movement permissions**, as put forward by 61.54% of the Member States. More than half (52.0%) of Industry responses, however, stated that they don't have practical experience with military transport, and only 27.08% agreed with Member States.

Member States highlighted that mandatory rules and procedures could facilitate standardisation and simplification, which would in turn accelerate the transport of troops and military equipment. Nevertheless, to ensure efficiency and interoperability, uniform technical standards are needed across all corridors designed for military mobility. A secure digital platform could / should be envisaged along with the harmonisation of rules to ensure that these are treated digitally in the future.

Industry stakeholders noted that a full harmonisation would be attainable, some additional operational rules may be necessary at national level. Harmonisation would lead to reducing bureaucratic burden, resulting in standardised and uniform procedure to facilitate cross-border movement.

With regards to **priority access rules similar to those contained in the Rail Capacity Regulation for other transport modes**, networks, and assets were welcome by 58.97% of the Member States and 39.58% of Industry, with 30.77% and 50% of the Member States and Industry respectively expressing their lack of knowledge on the issue. Member States agreed that it would be useful to apply similar rules to all transport modes, however it should be in balance with the civilian needs and transport flow. In principle, it was stated that in times of crisis or wartime it could be supported as means to enhance military mobility, as multimodal priority is crucial to ensure rapid response and uninterrupted logistical chains.

Industry stakeholders likewise agreed with the need of priority access in times of crisis, as harmonised priority access across all modes ensures a synchronised and coherent

movement of forces and equipment. Having priority for one mode of transport would simply shift the bottlenecks to other modes. Having a clear legal framework overriding civilian traffic would enhance EU rapid deployment and ensure that the civilian-operated transport assets can be swiftly repurposed for military needs, while remaining in close alignment with NATO.

2.5. Digitalisation and creation of a digital tool

The **added value of development and deployment of a digital tool** was recognised by 69% of Member States and 47% of industry stakeholders. The question of the **entity taking responsibility for management of the tool** was voiced as central and needed to ensure **necessary coordination among the Member States** to effectively use the tool

Generally, Member States were welcoming to digitalisation of cross border movement permissions. The main benefits raised by Member States are: limiting administrative burden, achieving efficiency and clarity in the process, allowing real-time data exchange are all important to minimise the delays caused by incomplete or incorrectly filled in forms and manual handling of the documentation. It was flagged that harmonisation of the rules is a pre-requisite, as the digital tool cannot be launched without pre-agreed uniform requirements, but that digitalisation should not be delayed. Handling sensitive information, cybersecurity resilience and ensuring compatibility with existing systems, including especially those of NATO, were mentioned as key features of the digital tool

2.6. Cooperation with NATO and other bilateral and multilateral agreements

Member States called for **a stronger cooperation with NATO** to avoid duplication of efforts. Some Member States voiced the need for military mobility training and simulation exercises. The majority of Member States and Industry stated that they see the **added value of having a common data set for the single electronic form 302 compatible between EU 302 and NATO 302**. Member States would also welcome the **harmonisation between the two 302 forms in a single electronic form**. Industry stakeholders were welcoming towards the unification of the forms, as it would strengthen the operational readiness and interoperability. Likewise, use of a digital harmonised form would be welcome, however, concerns pertaining to cybersecurity and data management were raised.

61.54% of **Member States** reported **participating in bilateral and/or multilateral agreements** in place that simplify such procedures, while the vast majority of Industry reported that the inquiry was not relevant. The most common frameworks for participations were: Permanent Structured Cooperation (PESCO), EDA Military Requirements related to Customs, “Secure Digital Military Mobility System” (SDMMS), and CBMP, NORDERFO and NATO’s Joint Support Enabling Command (JSEC).

2.7. Member States’ Coordination and role of the EU

On **coordination between the relevant ministers in the area of military mobility**, majority of Member States for whom the question was of relevance claimed that the coordination is **adequate** (33.33%), or **good to excellent** (48.72%). The majority of Industry, however, stated that the question was not relevant, with some referencing the current state of coordination as poor to very poor (39.58%). The most common means of

coordination for Member States was an **ad hoc coordination on a case-by-case basis** with 76.92%, closely followed by **coordination through a designated liaison or point of contact** with 58.97%. The coordination at national level was deemed to be sufficient and effective by Member States, but slightly insufficient by Industry, with a perception gap that was not overly wide for the latter.

Member States noted that the need for coordination across the ministers has significantly grown, expressing a need for or establishment of an inter-ministerial group, due to the necessity of a whole-of-government approach in planning process on strategic and operational level.

Many industry stakeholders emphasised the need to involve civilian parties and the necessity to have a designated liaison or point of contact on national level, responsible for coordinating the logistical process. They have further noted, that despite the EU efforts to harmonise the process, the national procedures still differ, highlighting the lack of real-time coordination tools, lack of digital platforms that would allow real-time tracking, clearance and coordination across ministries and transport operators. It was visible that while some industry operators are in close contact with the national ministries and cooperate on matters pertaining to military mobility, in other cases need for deeper cooperation was expressed.

When addressing how the EU could support Member States in fulfilling their commitments under the Military Mobility Pledge, Member States deemed harmonisation and simplification of existing EU law and procedures, uniform legal framework, financial support, clear information exchange and overview of existing initiatives as the main areas of support the EU could provide. The development of a digital tool, further investment into infrastructure and more possibilities of joint procurement of transport capabilities complying with dual-use criteria was also deemed important. Industry stakeholders saw the greatest added value in the financial support, coordination, and funding that could be used for funding dual-use projects. Uniformity of the legal framework, regulatory harmonisation, streamlining and simplifying the procedures to support military mobility.

2.8. **Protection and resilience**

In discussions on the present level of protection and resilience in military mobility, of those who answered, 56.41% of Member States and 60.42% of Industry deemed the **existing EU legislation insufficient in providing protection and resilience in military mobility**. There has been a broad agreement (64.1% for Member States and 75% for Industry) among stakeholders that there is **a need to further enhance the protection in the different areas of military mobility in the EU**.

Member States noted that it is not only about protection, but about resilience, therefore continuous improvements in this area must be made. The procedures must be standardised and digitalised, improvements must be made in the protection of critical infrastructure (e.g., further investment into the protection of sensitive areas), as presently critical entities are often insufficiently protected. Generally, an increase in capabilities for surveillance and security is needed. Protection should be enhanced throughout the entire supply chain, however, the work done should be coordinated across sectors, to avoid duplication and redundancies. The importance of energy security has been raised.

Industry stakeholders also emphasised the necessity to enhance protection on transport infrastructure (mostly railway networks against espionage and sabotage, bridges, tunnels, ports, airports and corridors), critical entities (potential targets for cyber-attacks or sabotage), and of data and digital systems (as military mobility increasingly relies on digital systems). Further monitoring, drone scanning, and integrated security protocols would be welcome. It was noted that the EU should also consider the availability of fall-back scenarios to further enhance resilience and ensure preparedness.

3. Assets and capabilities

3.1. Asset availability

The issue availability of transport assets for military mobility has been thoroughly discussed, with 66.67% of **Member States** considering it to be a **problem**, with a divide between those who found it to be a major problem (41.03% of the respondents) and those who found it to be a somewhat problem (25.64% of the respondents). Regarding **Industry**, the majority (45.83%) thinks it is **a somewhat problem**, 27.08% finding it a major problem, and 18.75% of them stating that the question is not relevant for them. It was noted that the **military mobility policy should focus not only on the infrastructure**, but also on the **assets and equipment necessary for the efficient use of the infrastructure and for the provision of the transport services**.

Looking at specific transport assets needed for military mobility in the EU, the Member States and the Industry mentioned in the consultation some of those that are most needed. Examples include rail wagon flatbeds, medical rail wagons, ADR trucks, HET trucks, specialised vehicles (e.g., vehicles for multimodal transport, heavy armour vehicles), strategic and tactical airlift dual-use ferries and tankers. Member States noted that for many of the mentioned capabilities, the EU is experiencing supply shortages, however for some of them increasing availability through production or contracting is easier than for other. Some such as ADR trucks are easier to replace than those where the production capacity in the EU is low such as rail wagon flatbeds.

It was once more noted that for each of the mentioned assets, the EU is experiencing shortages, production delays, or insufficient production. In connection with this, the labour shortages experienced across sectors were raised, often contributing to delays in production. When it came to which assets could be produced within the EU and made available for military mobility, the most listed assets were: rail wagons, heavy-duty loading ramps, availability of port facilities and inland vessels (i.e., vessels for inland waterways), road transport assets (e.g., heavy duty vehicles and ADR-certified vehicles), and transport ships.

Furthermore, lack of pre-negotiated framework contracts, rapid activation protocols and common interoperability standards is deemed problematic by Member States and Industry. In this regard the importance of translating military scenarios into service-level agreements was raised.

3.2. Procurement and production scale-up

Industry stakeholders raised in the consultation that in case procurement is based solely on national requirements (without EU requirements), there is a high risk that procured assets will not be interoperable. In this regard, coordination across the EU and with NATO would

be beneficial, especially in terms of adequate and targeted financing into dual-use projects and technologies.

In **addressing manufacturing during a crisis or contingency situation**, of those asked and for whom the question was of relevance, 23.08% of Member States and 50% of Industry responded that they **could scale up operations or manufacturing during a crisis or a contingency situation**. Member States and Industry noted, that for the scale up to be possible, there is a need for financial support to enhanced demand signal, an updated legal framework**.** Some raised the issue of personnel shortage. It was deemed necessary to have common clearly defined dual-use standards to ensure interoperability of the assets.

In discussions on strengthening the preparedness of military mobility, the idea of sharing and pooling of strategic dual-use transport assets was presented. When gathering input, of those asked and for whom the question was of relevance, there has been a consensus of 69.23% Member States and 62.5% Industry on sharing and pooling of strategic dual-use transport assets among Member States as beneficial to military mobility and preparedness. Of those, majority was welcoming under specific conditions and frameworks, to ensure legal clarity.

Member States noted that a creation of such a pool would need to be strictly controlled, lawful, and carried out according to a pre-determined procedure (i.e., have a precise set of rules governing the creation and use of the pool), perhaps requiring a coordinated entity to prioritise the use of the limited assets. Such an instrument could make the availability of transport assets within the EU more transparent (e.g., boost interoperability and reduce duplication) and serve as a basis for bilateral or EU led arrangements. However, it was also raised that this would require further coordination and therefore might hinder the rapid movement of equipment. A Member State also flagged the necessity to keep sufficient assets available for to meet internal needs, while another raised that pooling could be a solution in peacetime for efficiency reasons, but not in a crisis where a great number of assets is required. Those Member States that had experience in the area, referenced the following: ATARES, SEOS, MCCE, MRTT, NORDEFCO, EATC.

Industry stakeholders, while in favour of such a mechanism**,** pointed out the necessity of strict, clear allocation rules accompanied by a centralised management on the EU level, possibly in cooperation with NATO. A coordination system should be present for cross border deployment of the assets. It was recommended that a flexible model of pooling is developed to avoid that certain assets or capabilities are available only in specific countries and regions. Further sharing of transport capacities would be welcome, as it would be cost-effective and enhance the readiness. A point of concern was the feasibility of such a project due to logistical and political constraints. As their experience in the area, they referenced the rental of transport capabilities, leasing solutions already in place, and the rescEU initiative under the umbrella of the EU Civil Protection Mechanism (UCPM). However, it was also noted that seizing various assets from civilian use can have consequences for the functioning of the businesses and industries which would negatively impact the competitiveness of the EU – this outcome shall be prevented.

3.3.**Labour**

Regarding the matter of **reskilling of labour**, the majority of Member States stated that the question wasn't relevant (48.72%), and 38.46% that they saw areas where it **could**

benefit military mobility, but it would **need to be improved**. This last response reflected the majority opinion among Industry (41.67%).

Member States highlighted that retraining civilian personnel in military mobility enhances preparedness, speeds up movements and enhances EU-NATO interoperability in times of crisis. Focus has been mostly on customs officers, road and rail authorities, military personnel, and staff of ministries of transport and defence. It has been further raised, that majority of truck drivers operating in a Member State are not nationals of that Member State, being citizens of other Member States or a third state, which could be problematic in times of a crisis (i.e., due to availability of the workers, labour law protection of the workers).

Industry stakeholders on the other hand noted that nowadays it is necessary to design equipment and infrastructure for dual use purposes, therefore familiarity with the military standards would be useful (e.g., knowledge of EU and NATO protocols for handling of sensitive or hazardous materials), and reskilling of labour would be beneficial. Additionally, during commercial transport of military equipment across countries, it would be useful to have a national liaison officer overseeing the logistics process. In case of further digitalisation of the process, it would be necessary to improve digital competences among personnel as well as provide further training pertaining to military mobility (mostly on safety and applicable rules and protocols). An underlying issue of labour shortage among several sectors (rail and road transport, cybersecurity) was noted.

4. <u>Infrastructure</u>

4.1. Fuel infrastructure and availability of civilian oil stocks

When asked whether there are **challenges in access to fuel supply when armed forces are moving in the EU**, 61.54% of **Member States responded positively**. Meanwhile, among Industry, the proportions were nearly identical between those who deemed it problematic, those who did not, and those who did not respond, with a slight majority leaning toward the first.

Member States noted that while all countries are dependent on petrol deliveries for both, civilian and military purposes, the availability in EU eastern flank might be worse than elsewhere, highlighting the necessity to expand the NATO fuel pipeline east and create linkage with critical transport infrastructure. It was noted that the availability of fuel differs in peacetime and times of crises, as well as on the proximity to the frontline. There should be a reliable supply chain and sufficient storage capacities along strategic transport corridors, which are essential for ensuring uninterrupted mobility during crises. The notion of green transition has been raised in connection with the decrease in fuel refineries.

Industry side raised that while there are sufficient diesel fuelling facilities this is not the case for renewable fuels. There should be an overall increase in the numbers and capacities of the supply points, highlighting that some ports have insufficient fuel storage for a naval fleet. It has been raised once more that there is worse fuel availability in the eastern flank, as majority of the refining capacity is concentrated in western Europe. Additionally, there are rising concerns surrounding the shrinking refining capacity driven by the lack of competitiveness in the global market and the anticipated decline from the commercial sector due to energy transition. It has been highlighter that while fossil fuels are slowly being phased out, they will remain important for military operations, therefore it is

essential to manage the transition without restraining the EU and NATO military readiness. In light of the transition, it was noted that the EU and Member States should focus on dual-mode assets (i.e., diesel-electric or battery-electric assets), and ensure that military forces are provided with fuels required for the operationalisation of their equipment, which may not necessarily follow the de-carbonisation path.

Generally, there has been a broad consensus that the armed forces should be allowed to use (civilian) emergency oil stocks in the case of an emergency or war, with more Member States responding affirmatively than Industry (76.92% compared to 56.25%). Member States highlighted that it is fundamental for the military to be able to function and carry out their tasks in times of crisis or wartime to ensure operational readiness. However, this must be well-coordinated and prioritised alongside the needs of the civilian population and sufficient compensation should be provided to the company or entity storing the oil stocks. In some cases, such a use shall be subjected to governmental approval and be governed by national legislation. Those against, raised the risk of disrupting national production and the economy, which could lead to harm the civilian population, and instead suggested the establishment of separate military stocks.

Industry sector likewise agreed that in times of crisis, war or emergency armed forces should have access to critical resources, as it is essential for the defence and survival, therefore civilian discomfort must be weighed against the greater risks. It was highlighted that due to the confidentiality, the information of usage of fuel in times of crisis is rarely shared with other states or civilian sector. In line with this, it is often unclear under which conditions the stocks may be requisitioned or require the state of emergency. It was also raised that this should be arranged with the owners of such stocks, as they might require compensation. In this aspect several bottlenecks were raised, as in some cases even with civilian stocks, the oil reserves may not be sufficient, or the reserves may be located on a territory of another country.

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