



ETF position on Military Mobility

July 2025

The European Transport Workers' Federation is bound by its Constitution¹ to promote peace and oppose all forms of physical, political or social violence. ETF joins the rest of the European trade union movement in underlining the need to support international law based on multilateralism, the refusal of war to change borders, and the right to defence against aggression. ETF believes that the fundamental role of the transport sector is the promotion of prosperity, socio-territorial inclusion, and high-quality employment.

ETF is painfully aware of the fact that, despite fighting for peace, transport workers across the world, including in Europe, often find themselves in the midst of armed conflicts. Indeed, many transport workers are required in times of crisis and war to not only maintain civilian mobility but to support military supply chains. Due to the essential and strategic nature of transport, the workers ETF and its affiliates represent have been repeatedly targeted directly by state and non-state actors².

Furthermore, ETF acknowledges the difficult geopolitical situation in which Europe finds itself. ETF endorses the European Trade Union Confederation's (ETUC) call for the EU to guarantee peace, the rule of law, human rights and social progress, including through coordinated and improved security processes³. The security and preparedness of our common European home – understood broadly to include social resilience and the defence of democracy – is of utmost importance to ETF. However, ETF strongly opposes any instrumentalization of this vital issue to water down social rights and labour standards as part of a deregulatory agenda.

Therefore, ETF participates in the ongoing discussions on military mobility for three main reasons. Firstly, to advocate the protection of safety and wellbeing of transport workers in difficult international context. Secondly, to leverage its position representing front-line workers to provide policymakers with unmatched on-the-ground insights regarding the transport sector in a good faith effort to improve the preparedness and resilience of our continent. Finally, ETF welcomes the opportunity to highlight how many of the policy mistakes made in the past decades regarding the transport have also undermined the sector's ability to provide security and resilience.

¹ <https://www.etf-europe.org/wp-content/uploads/2022/07/2022-Constitution-EN-1.pdf>

² <https://www.itfseafarers.org/en/news/rage-red-sea>

³ <https://www.etuc.org/en/document/resolution-peace-and-security>



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1. Whole-of-society, protection of European values, and the definition of emergency situations

1.1 Whole-of-society: consultation and preparation

In his report on resilience and preparedness published last year⁴, President Niinistö underlined the need for a “whole-of-society” approach to crisis response, bringing together “not only public authorities at all levels, but also private entities, employers and **trade unions** [emphasis added], civil society organisations, and individual citizens.” This approach was also endorsed by the Commission’s own Preparedness Strategy, published earlier this year⁵. Enhancing the agency of citizens and workers will not only enable them to play an active role in crisis preparedness and first response, but also give greater “ownership” of any needed emergency measures.

The governance of military mobility should therefore have a clear and meaningful role for social dialogue and the consultation of transport workers’ unions, both at European and national level. This is consistent with the Treaty obligations to consult social partners on topics that affect them. While many aspects of military mobility require confidentiality, transport workers must be involved in the elaboration of plans that impact their work and ability to maintain supply chains, both military and civilian, and the services relied upon by civilians for daily life in a time of crisis. After all, there can be no mobility of any kind without transport workers. Furthermore, transport workers and their unions are the only stakeholders that can bring direct, on-the-ground, insights regarding the functioning of transport systems. Excluding them from policymaking will therefore reduce the effectiveness and accuracy of military mobility plans.

During the Covid-19 pandemic, the European Commission did not adequately consult transport social partners, despite ETF calling for a task force of EU-level social partners to advise on transport policy. The consequences of this mistake included a degradation of working conditions and health and safety measures, with severe spillover effects on the effectiveness of EU transport.⁶ This mistake cannot and must not be repeated. ETF therefore calls for the creation of a specific body at EU level to bring together transport social partners for military mobility, and a clear requirement within the Military Mobility communication for Member States to involve national social partners.

1.2 European values - a strength not a weakness

According to the TEU, the EU is founded upon fundamental European values – the respect of human dignity, freedom, democracy, equality, the rule of law, and respect for human rights. Moreover, the Charter of Fundamental Rights, in line with national constitutional traditions, recognises as inalienable several fundamental labour rights, including the right of workers to information and consultation (Article 27), the right of collective bargaining and action (Article 28), and the right to fair, just, and dignified working conditions (Article 31). ETF, alongside the entire European trade union movement, underlines that these values and fundamental rights constitute a source of strength for Europe. Any derogation or deviation from these principles would not only constitute a

⁴https://commission.europa.eu/document/download/5bb2881f-9e29-42f2-8b77-8739b19d047c_en?filename=2024_Niinisto-report_Book_VF.pdf

⁵https://commission.europa.eu/document/download/526806b6-c4e1-43d1-81b7-947308efbab1_en?filename=Joint%20Communication.pdf

⁶ <https://www.etf-europe.org/covid-19-etf-reacts-to-ecs-guidelines-for-travel-and-transportation>



betrayal of our common heritage, but would also weaken societal resilience and security.

For this reason, ETF is extremely concerned about the Commission's recent Defence Omnibus communication, in which derogations to the Working Time Directive were suggested for the defence industry. As underlined by IndustriAll Europe and ETUC, it is unacceptable to weaken such a cornerstone of the EU's social policy under the guise of military preparedness.⁷ Such attempts must not also find their way into the upcoming Communication on Military Mobility.

Unnecessary and harmful derogations to the social *Acquis Communautaire* in transport were undertaken during the pandemic, notably in the road transport sector. Derogations to the driving and rest hours regulation in 2020 led to atrocious conditions for drivers, with some spending as much as 12 days confined to their vehicles. These derogations were entirely unnecessary, as there were more than enough drivers to meet demand.⁸ The consequence of this decision, undertaken with little to no consultation with unions, are still being felt today in the form of the debilitating labour shortages affecting the road transport sector as many drivers simply left the sector to find better jobs. Any derogations during emergency situations must be fair, proportionate, and agreed in advance with workers' representatives (see point 1.3.)

Watering down workers' rights, including occupational safety and health, in order to improve military mobility would therefore be disproportionate and self-defeating.

| 1.3 Defining a transport emergency

ETF would cautiously welcome the elaboration of a common definition of an emergency transport situation. There is a clear need for coordination and clarity, especially for a sector so reliant on cross-border interactions such as transport. Workers' need to know in advance in which situations they will be called upon to undertake essential and possibly dangerous work, their rights and responsibilities in such situations, and means of redress in extraordinary circumstances. It is vital that such a framework is elaborated, in consultation with social partners, before it is actually needed as usual forms of resolution of industrial disputes may legitimately be restricted during security crises (see point 4.1.). However, ETF has several red lines regarding any possible definition.

Firstly, a strike by transport workers can never justifiably be considered an emergency. This has been confirmed by CJEU case-law.⁹ The right to strike is a right guaranteed by Article 28 of the Charter. Accordingly, per the Court's words, "a strike nevertheless remains one of the ways in which collective bargaining may manifest itself and, therefore, must be regarded as an event inherent in the normal exercise of the activity of the employer" and cannot therefore be considered an abnormal or unforeseeable event.¹⁰ It is clear that a strike or any other forms of lawful industrial action in itself can't constitute an emergency for which exceptional measures can be taken. The inclusion of strikes and other forms of industrial action within the definition of a transport emergency would be met with the strongest possible response from ETF, its affiliated unions, and the entire European trade union movement.

Secondly, the definition and declaration of a transport emergency, and any associated measures, must be proportionate and justified. ETF does not consider that there currently exists such an

⁷ <https://industrial-europe.eu/Article/1305>

⁸ <https://www.etf-europe.org/etf-calls-for-no-more-derogations-to-driving-and-rest-time/>

⁹ See *Airhelp* (C-28/20) and *Organisationen Danske Slagterier* (C-338/89)

¹⁰ *Airhelp* paragraphs 28 and 33



emergency that would justify any derogations from the social *acquis*, such as rules on working time or occupational safety and health (OSH), among others. No restrictions on transport workers' rights can legitimately be put in place in the absence of such an emergency, and such restrictions will not help Europe's military mobility capabilities. In actual fact, readiness and resilience in the transport sector require investments in high-quality jobs, training and sufficient staffing levels so that the sector and its workers can be adequately prepared for an emergency (see section 2 below).

Finally, as mentioned in point 1.1., the elaboration of a common definition of transport emergency and any associated frameworks must be done in full consultation with those actors who best know the sector – social partners.

2. Essential transport workers

2.1 The urgent need to improve job quality

The transport sector as a whole is currently afflicted by severe and structural labour shortages. These labour shortages are fundamentally driven by poor and declining employment quality. Shortages are particularly acute for truck drivers, seafarers, mechanics, bus and tram drivers,¹¹ as well as in railways, air traffic management, and ground handling. Furthermore, transport professions are increasingly unattractive to young workers, especially young women, a fact that threatens the long-term sustainability of a sector where a significant share of the workforce is currently approaching retirement. The response from employers and policymakers has been to increasingly rely on third-country nationals (see section 2.4. below).

Sectors and firms with the greatest labour shortages are the ones which comparatively offer the worst wages¹². This is backed up by OECD data, which shows that real wage improvements in sectors experiencing labour shortages, including transport, have been largely absent in the past decade. Similarly, serious degradations in job quality and increases in job strain have also led to greater shortages – across the OECD transport workers are three times more likely to experience a non-fatal accident at work and 6 times more likely to have a fatal accident compared to the average worker.¹³ The Commission's own research shows that high job strain is strongly associated with persistent labour shortages, especially in transport.¹⁴

Labour shortages evidently threaten the ability of the sector to act in an emergency and consequently the effectiveness of military mobility as well as the response to any other crisis. In a security crisis, military personnel will not be sufficient to ensure effective mobility, whether for military or civilian purposes. This is particularly the case for sectors in which the military has little to no independent capacities, such as railway. Considering rail's indispensable role in military mobility, the shortage of trained civilian railway workers represents a major strategic weakness. Even for transport modes that require limited formal training, such as road transport, the lack of experienced and seasoned drivers raises significant security and safety concerns, especially in relation to dangerous military cargoes.

¹¹ www.ela.europa.eu/sites/default/files/2024-05/EURES-Shortages_Report-V8.pdf

¹² https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4975409

¹³ https://www.oecd.org/en/publications/labour-shortages-and-labour-market-inequalities_14e62ec0-en.html

¹⁴ <https://op.europa.eu/en/publication-detail/-/publication/680d6391-2142-11ee-94cb-01aa75ed71a1/language-en>

2.2 Sufficient staffing levels to guarantee resilience

Many transport modes suffer from serious and structural understaffing, driven primarily by cost cutting and the unattractiveness of the sector. This is especially the case in railways, a vitally strategic element of military mobility. Employment in railways has declined massively across Europe due to privatisation, liberalisation and fragmentation of the sector. The decline in employment cannot be attributed to increased productivity, as railway operators across Europe struggle to run services due to labour shortages.¹⁵ Understaffing of critical transport services represents a severe security risk, as there are insufficient workers to guarantee the safety, especially in crisis situations. This was tragically demonstrated in the 2023 Tempi Rail Disaster, caused in part by the fact that staffing levels were well below those required for safe operation of railway services.¹⁶

In aviation, even in the absence of a security crisis, the share of airspace for military use is already growing and will continue to do so, mainly for military training. In a structurally depleted air traffic management (ATM) system, capacity shortages in civilian ATM will become even more evident, leading to more flight delays and cancellations. Growing military use of airspace will also lower the performance evaluation of ATM service providers, namely in capacity and environment. This should be recognised in advance to avoid misleading conclusions. More investment is therefore needed to address the significant and worsening labour shortages in ATM by training and hiring more ATM workers.¹⁷

Sufficient staffing is required to ensure the safety and viability of transport services, both during normal operation as well as during crises. The current level of understaffing seriously undermines the resilience of the sector.

2.3 Skills and training for emergencies

Military mobility is likely to entail non-standard and complex transport operations, such as moving hazardous cargoes or operating under dangerous circumstances. Transport workers engaged in military mobility must therefore be equipped with the highest standards of training and skills, both to protect their wellbeing in difficult situations as well as ensuring the safety of materiel and the public at large.

However, there has been a sharp decline in training opportunities provided to transport workers. At a macro level, between 2015 and 2020 the share of employers providing training declined in all member states except Italy and Portugal.¹⁸ Anecdotally, ETF affiliates have warned that training standards are slipping in key sectors such as railways, road transport, maritime transport, and urban public transport. Cost-cutting driven by commercialisation and liberalisation have reduced training budgets to minimal levels, and systemic labour shortages means that there is little slack to allow workers to go on training leave. As an example, in January 2022 two freight trains collided at Prosenice station in Czechia. Investigations found that the driver of the train had completed far fewer training hours than what was required by law.¹⁹ Thankfully, there were no casualties, but the

¹⁵ <https://www.etf-europe.org/wp-content/uploads/2024/01/ETF-RAILWAY-REPORT.pdf>

¹⁶ <https://www.investigate-europe.eu/posts/french-contractor-italian-owned-trains-eu-policies-greek-crash-was-also-a-european-failure>

¹⁷ <https://www.etf-europe.org/wp-content/uploads/2025/07/Untold-truths-about-delays-and-cancellations.pdf>

¹⁸ <https://www.eurofound.europa.eu/en/publications/2024/company-practices-tackle-labour-shortages>

¹⁹ <https://www.etf-europe.org/wp-content/uploads/2024/01/ETF-RAILWAY-REPORT.pdf>



situation would have been very different had the train been loaded with munitions. Similarly, rising cyber-attacks and sabotage against critical railway infrastructure require transport workers to be trained and equipped to deal with these new threats.

Full and adequate training is required for all workers, who need to be able to operate in degraded situations such as a cyber-attack knocking out digital tools. Personnel should meet elevated security requirements, including strong qualifications and appropriate training. The current commercialised model, in which operators are forced into a race-to-the-bottom in terms of cost-cutting, precludes any serious investment in skills.

| 2.4 Third-country nationals

As working conditions and the attractiveness of transport professions continue to deteriorate, employers are increasingly turning to third-country nationals to meet labour demand. This is especially the case in the road transport sector, which has seen massive substitution of EU workers with third-country nationals. In Lithuania, the member state that has issued the second highest number of driver attestations, third-country nationals are estimated to make up 65% of all heavy truck drivers.²⁰ There is evidence of widespread exploitation of these third-country workers, many of whom live and work in conditions approaching modern slavery.²¹

Similarly, employment in the EU-owned shipping fleet is largely made up of third-country nationals. Fewer than 40% of crew positions on EU-owned ships are staffed by EU nationals.²² The widespread exploitation of third-country workers not only represents a betrayal of European values, but also raises serious questions about transport work during security crises. Member states will only be able to requisition workers that hold their nationality. Even if an EU-wide framework for civil conscription is created, member states will not lawfully be able to requisition third-country workers.

Seafarers who are nationals and residents of non-European member states may seek their right to return home, rather than remain in a war-zone. In a wider-scale crisis, these workers may in fact be required to return to their home countries in order to support their own national interests. Furthermore, workers who are nationals of hostile states may face calls from their state to redirect European vessels and assets to non-allied nations. Workers from hostile nations may also face restrictions on their mobility.²³

Such reliance on third-country nationals in crucial sectors means that, in the event of a security crisis, labour shortages will become even more acute. The only way to resolve this issue is to take fundamental steps to improve job quality and attractiveness well in advance of finding ourselves in a crisis situation.

| 3. Ownership and control

| 3.1 Coordination vs liberalisation

²⁰ <https://www.etf-europe.org/wp-content/uploads/2025/04/ETF-ROAD-TRANSPORT-REPORT.pdf.pdf>

²¹ <https://www.etf-europe.org/hegelmann-group-new-evidence-of-exploitation-of-third-country-truck-drivers/>

²² https://www.etf-europe.org/our_work/maritime-transport/

²³ <https://maritime-executive.com/article/norway-to-tighten-restrictions-on-russians-navigating-in-local-waters>



EU transport policy has been defined in recent decades by a push towards liberalisation, with many reforms aimed at promoting competition in every transport mode. As seen above in previous sections about working conditions, this dog-eat-dog competition promoted by European policymakers has resulted in a race to the bottom in terms of working conditions and salaries. Furthermore, these policies have fundamentally undermined the ability for these entities to operate in crises. As noted by military logistic experts, during the Cold War much of the civilian transport infrastructure and operators were state-owned, allowing military planners to effectively integrate civilian assets into their strategies. After decades of privatisation and liberalisation, this is no longer possible.²⁴ For example, the splitting of state railways into infrastructure managers and railway operators has created coordination failures and reduced incentives to make long-term investments in infrastructure and rolling stock.²⁵

Similarly, the current, competition-based approach to transport policy has totally undermined Europe's capacities in military mobility. The EU policy has contributed to the crippling breakup of Europe's two largest rail freight operators – SNCF Fret and DB Cargo – through short-sighted state-aid rules.²⁶ The rail freight market is increasingly characterised by small and fragmented operators which are unable and unwilling to provide a fine-mazed network of rail connections, or to make necessary investments in rolling stock required for military mobility. This is worsened by the fact that many of these small operators do not even own their own rolling stock, instead renting them from rolling stock leasing companies, who have even fewer incentives to invest in military mobility capacities, especially as some of the largest of these firms are owned by third-country entities. For security reasons, only state-owned railway companies are suitable for operating military services.

Europe's railway networks must be under public control. The European Union should also allow member states to provide stronger support for integrated public railway systems, combining infrastructure and operations. This would enable faster response times and better coordination between infrastructure and services, especially in times of crisis. Without a change in policymakers' attitudes towards transport – acknowledging its worth as a public good instead of a market – there is little hope for effective military mobility.

3.2 Reversing historical mistakes on critical infrastructure and transport assets

For decades now ETF and its affiliated unions have warned about the dangers of privatising critical transport infrastructure, especially when this infrastructure is sold to entities linked to adversarial third countries. The sale of the Port of Piraeus, Europe's 8th busiest port, to the Chinese state-owned COSCO, is the clearest example of such a historic mistake.²⁷ Critical infrastructure being held in private hands undermines security and reduces incentives to invest in redundancy and resilience.²⁸

A similar situation exists in the maritime transport sector. Despite more than 40% of the world's fleet being owned by EU entities, only 19% sails under an EU member state flag, down from 34% in 1980. This is despite the fact that these EU shipowners have received billions of Euros in public

²⁴ <https://www.tandfonline.com/doi/full/10.1080/03071847.2024.2434137>

²⁵ <https://www.e-ca.com/wp-content/uploads/2025/01/executive-summary-vertical-integration-in-rail.pdf>

²⁶ <https://www.etf-europe.org/wp-content/uploads/2023/10/Open-Letter-to-the-Commission-Fret-SNCF-and-DB-Cargo.pdf>

²⁷ https://www.etf-europe.org/wp-content/uploads/2018/10/060314_ETF-IDC-Motion-Greece.pdf

²⁸ <https://www.tandfonline.com/doi/full/10.1080/03071847.2024.2434137>



money.²⁹ The practice of European shipowners choosing to register their vessels in flag of convenience jurisdiction threatens the EU's capacity for strategic maritime transport. Under maritime law, ships are subject to the law of the flag they fly, meaning that ships registered under flags of convenience or other non-European flags, cannot be requisitioned by EU states – even if they are owned, operated and subsidised by Europeans.

The ETF maritime affiliate in the Netherlands, Switzerland and United Kingdom, Nautilus International, together with an American affiliate of the International Transport Workers' Federation, recently published a study - NATO Member States' National Merchant Fleet and Seafarers. The report's key findings reveal threats to national security, the effectiveness of military logistics, and resilience of supply chains stemming from the decline of national fleets and the decline in numbers of national seafarers. A copy of the report is annexed to this submission.

Finally, in civil aviation, the Commission must not weaken rules on ownership and control (O&C) of European airlines in the upcoming revision of the Air Services Regulation. Allowing European airlines to be owned by third-country entities would pose a significant risk to European geopolitical autonomy, especially related to ongoing efforts related to civil-military harmonisation, coordination and integration. Furthermore, third-country owners may not be relied upon in the event of a security crisis affecting Europe. The USA already has much tighter rules on O&C than the EU for precisely these reasons.

| 3.3 Untransparent ownership and fragmentation

As noted in section 3.1, current transport policy has undermined effective coordination of infrastructure and networks. The fragmentation brought about by liberalisation is coupled with untransparent and highly complex corporate structures that prevent enforcement of legislation and obscure ultimate ownership and responsibility. Chief among these problems is the practice of letterbox companies, whereby firms register in a jurisdiction in which they have little to no legitimate activities, solely to avoid regulatory accountability. ETF has warned about the use of letterbox companies to abuse the EU's single market. In sectors such as road transport, operators use letterbox companies to engage in social dumping, ignoring collective agreements and applicable labour law. Not only is this practice deeply damaging for the rights of workers, but it also obscures the ultimate owners of vital transport assets

Similarly, experts have noted that military logistics have followed their civilian counterparts in employing long subcontracting chains, in which responsibility and accountability are obscured.³⁰ ETF has consistently highlighted the severe issues related to long subcontracting chains, not least of which the shocking labour exploitation that these business practices allow.³¹ Furthermore, the fragmentation of responsibility, accountability and control throughout civilian logistics makes these supply chains extremely brittle, as demonstrated in crises such as Covid-19.³² ETF affiliates have highlighted cases in which military logistics are being undertaken by civilian firms engaging in labour crimes. It is therefore vital that EU action is taken to limit subcontracting, enforce due diligence and force end-users to adequately invest in long-term resilience of their supply chains, not least of which through investments in high-quality employment.

²⁹ <https://www.etf-europe.org/wp-content/uploads/2024/01/European-Dockers-and-Seafarers-Manifesto-for-a-Fair-Maritime-Sector.pdf>

³⁰ [https://openaccess.city.ac.uk/id/eprint/15815/1/Think%20Again%20\(AM\).pdf](https://openaccess.city.ac.uk/id/eprint/15815/1/Think%20Again%20(AM).pdf)

³¹ https://www.etui.org/sites/default/files/2025-06/Sorry%20we%20subcontracted%20you_2025.pdf

³² https://www.nber.org/system/files/working_papers/w32221/w32221.pdf



In the event of a crisis requiring the requisitioning of transport assets, it will be vital to quickly and clearly understand who owns what, and under the jurisdiction of which member state. Similarly, it will be important to understand who the real employers of transport workers are. Complicated and obscure ownership practices, undertaken only to avoid employment obligations or other regulations, will seriously hamper any such attempt.

In maritime transport, the United Nations Convention on the Law of the Sea (UNCLOS) is an essential instrument that can be used to overcome some of these issues. The principle of a genuine link between ships and their Flag States should be reaffirmed and enforced, aligning with UNCLOS Article 91. In addition, UNCLOS Article 94 – the principle of the duties of a Flag State – should also be reaffirmed and enforced. Similarly, the United Nations Convention on the Conditions for Registration of Ships (1986) should also be reviewed, as a further instrument to mitigate some of the identified issues.

4. Requisitioning and civil conscription

4.1 Defining the status of conscripted workers

ILO Convention no. 29 on forced labour explicitly excludes military service or work “required in the event of an imminent state of danger” from its definition of forced labour. Similarly, Article 15 of the ECHR allows for states to derogate from the rights contained in the convention in exceptional circumstances, provided that such derogations are necessary and proportionated to the situation.³³ Within a real emergency situation, it is therefore undeniable that workers may be legitimately requisitioned to work in the general interest. However, there are still a series of crucial aspects of such civil conscription.

Firstly, there is no European framework for the requisitioning of workers, which is governed by national legislation on civil protection and the armed forces. There are no clear rules that set out which workers can be requisitioned, under which circumstances, and by which authorities. Furthermore, considering that transport is a sector characterised by a high degree of cross-border labour mobility, as well as a high degree of integration across national borders in terms of company structures and operations. There is therefore a risk that, during a security crisis, there will be significant conflict between member states as they try to requisition assets and workers in an unclear legal situation.³⁴ As referenced in section 2.4, third-country nationals may be requisitioned by their home nation, leading to significant shortages of workers in industries that rely heavily on non-European workforces, such as maritime. This reiterates the importance of establishing maritime and other transport sectors as attractive industries in which European workers want to work, well in advance of a time of crisis.

It would therefore be useful to develop an EU framework for the requisitioning of transport assets, setting harmonised standards and procedures, including for health and safety (discussed in section 4.2). Such a framework must be elaborated in close cooperation with social partners, in line with article 154 TFEU. Furthermore, it must take into account the fundamental right to conscientious objection, recognised by article 10(2) CFREU and national legal traditions. Finally, as the right to strike can legitimately be restricted in emergency situations, such a framework must also contain

³³ https://www.echr.coe.int/documents/d/echr/fs_derogation_eng

³⁴ <https://www.tandfonline.com/doi/full/10.1080/03071847.2024.2434137>



clear and effective means to resolve industrial disputes involving requisitioned workers.

| 4.2 Safety and wellbeing in emergency situations

Similarly to the previous section, occupational safety and health (OSH) rules may be derogated during an emergency situation. The OSH Framework Directive (89/391/EEC) already contains an exception for armed forces and civil protection (Article 2(2)). However, just because the normal rules are not applicable, workers safety and wellbeing must be protected to the upmost extent. An updated legal framework on the military use of civilian assets must therefore include provisions for the general safety and security of workers. This must also include OSH provisions related to the transportation of dangerous cargo.