

Brussels, 4 June 2026

Honourable Minister,  
Honourable Ambassador,

I am writing to you about the European Commission's proposal for a Regulation on Military Transport (COM(2025)0847).

On behalf of the European Transport Workers' Federation (ETF), representing 5 million transport workers across Europe, and in view of the ongoing debate to reach a General Approach to military mobility in the Council of the European Union, I would like to outline key elements that we believe should be taken into account in the discussion.

- **Military mobility plans rely on civilian transport workers.** The regulation is built on the delusional assumption that transport systems can absorb additional pressure during crises. Across Europe, most transport sectors face severe labour shortages, with ageing workforces, and persistent challenges to recruit and retain workers. Staffing levels are often already at their minimal point. Long-term resilience will require seriously investing in transport jobs: their pay, their working conditions, their benefits.
- **We need proportionality in activating the exceptional regime (EMERS/EMMERS) and derogating to important sets of rules and procedures in transport.** First, it needs to be linked to the existence of a threat, reviewed periodically. Second, it should be clear that collective industrial action in accordance with national law, is not a situation that can trigger EMERS.
- **Derogations in road transport are disproportionate:** proposed changes to **driving and rest time rules** will make it possible to drive up to 12 weeks with only one 24-hour rest per week. This goes even beyond the strain put on drivers during the Covid-19 pandemic, which caused dozens of thousands to leave the profession for good. Besides, assuming operators would even find drivers willing to work like this, such practice is a clear safety hazard and must be rejected. Similarly, **cabotage rules** exist for a reason, and lifting them should be reasoned and proportionate, all the more in peacetime.
- **The best way to minimize social conflict and get workers and citizens' acceptance of exceptional rules is to negotiate them in advance.** Implementation plans, as well as contingency plans for times of emergency, must be drawn at relevant levels, including workplace level if appropriate, with the involvement of social partners. They should cover, for instance, compensation for extra hours or lost shifts, fair arrangements to work organization and safety.
- **Military transport is not a trivial activity that just anyone can be trusted with.** Military transport by rail should never be outsourced. In other transport modes, we welcome the proposal of a certificate for Military Transport. Across the Union, its issuance should be conditional upon strict vetting on, at least, high training standards and compliance records. For the road sector, rife with fraud, only civilian operators compliant with EU applicable

rules, in line with Regulation (EC) 1071/2009 amended by Regulation EU 2020/1055, should be contracted.

- **Handling or transporting military cargo puts workers at risk.** Dedicated training is necessary, but so is protection of this cargo; civilian workers cannot be held liable for theft, destruction or sabotage by third parties. **Employers or the contracting authority have a responsibility to prevent incidents.**
- **In companies or sectors called by the State to support military transport in times of emergency, post-emergency recovery requires support to employment.** Compensation is crucial to maintain those companies and their staff level afloat; where personnel has to be laid off as a consequence of emergency reorganization of activities, these workers should be entitled to compensation.
- **the proposed amendments to the EASA Basic Regulation must be strictly limited to military mobility.** As proposed by the Commission, they introduce structural changes to the EU aviation safety framework that are neither limited to military mobility nor restricted to emergency situations. Broad changes to aviation safety rules must be subject to a dedicated legislative process with full stakeholder consultation, not be introduced indirectly through a preparedness instrument. A longer analysis and ETF proposals for amendments are in the document attached.

For more details, please refer to the [ETF position on the Military Mobility Package](#).

I present you these recommendations in a good faith attempt to improve the preparedness of our continent. Some of these concerns are already on the table for discussion in the TRAN and SEDE committees of the European Parliament. I trust that you, too, will see the shortcomings of the European Commission's proposals, and I urge you to take the necessary steps to correct course. The ETF is available to clarify or discuss further, should you wish to do so please contact Julie Martinaud at [j.martinaud@etf-europe.org](mailto:j.martinaud@etf-europe.org).

Sincerely,



Livia Spera  
ETF General Secretary