

POSITION PAPER

Freight forwarders' views on the EU Ports Strategy

CLECAT welcomes the opportunity to contribute to the European Commission's [Call for Evidence](#) for the future EU Ports Strategy and looks forward to also providing input to the upcoming targeted consultation. As recognised in the call, ports are critical hubs of international trade and geo-economic resilience, playing a key role in the EU's competitiveness, the energy transition, military mobility, and the fight against organised crime.

Ports are the lifelines of international trade and commerce, serving as critical nodes in the global logistics network. They are not merely gateways for trade but are integral to the seamless functioning of the entire logistics ecosystem. The importance of ports extends beyond their traditional role in facilitating the movement of goods; they are also key drivers of economic growth, employment, and regional development.

As the European Union prepares to shape its future Ports Strategy, CLECAT, representing the interests of freight forwarders, logistics service providers and Customs agents, emphasises the need for a holistic approach that considers the interconnected nature of the logistics and transport sectors. CLECAT advocates for policies that promote innovation, sustainability, and digital transformation, while also ensuring that the sector remains resilient and adaptable to future disruptions.

This position paper outlines CLECAT's comprehensive views and recommendations for the future European Ports Strategy, focusing on enhancing competitiveness, transparency, and accessibility for all logistics actors.

Background: growing pressure on port performance and resilience

A forward-looking Ports Strategy must start from an open assessment of the current challenges facing the maritime logistics system in Europe. While global shocks such as the COVID-19 pandemic and the Red Sea crisis have attracted public attention, structural issues are increasingly at the root of persistent congestion and inefficiencies. From the perspective of freight forwarders and logistics service providers, addressing these problems is vital to improve reliability, optimise operations, and maintain Europe's global competitiveness.

The European maritime logistics system is currently under significant strain, with congestion becoming a widespread and persistent challenge across major European ports. In many parts of Europe, unpredictable vessel schedules reflect deeper structural issues. A persistent lack of visibility in port and inland operations is undermining European competitiveness.

This situation highlights systemic vulnerabilities that must be urgently addressed to ensure the system's preparedness for future disruptions. Structural inefficiencies, such as unpredictable booking processes and the relentless upscaling of container vessels, have placed extraordinary pressure on

port infrastructure. Large container ships, many exceeding 24,000 TEU, now berth in ports for extended periods, creating peak loads that the landside infrastructure was never designed to absorb. This has led to truck queues, traffic jams, warehouse congestion, and the rescheduling of pre-carriage, which have become the norm rather than the exception. This situation, combined with potential additional administrative challenges for port stakeholders, is likely to weaken the competitiveness of EU ports.

Despite progress in automation and digital tools, the lack of effective real-time communication between terminals, carriers, and shippers exacerbates these issues, leading to cascading disruptions and additional costs. This is why CLECAT has called for a renewed focus on resilience and efficiency in European maritime logistics, underlining the growing pressure on the system despite the absence of a major global crisis.

Reinforcing the competitiveness of EU Ports and logistics actors

Open and fair access to port services

Freight forwarders depend on non-discriminatory access to terminal slots, cargo handling, and port community systems. However, growing consolidation and vertical integration in the maritime sector have reduced service options and undermined competition. In particular, global shipping lines have not only consolidated into a few powerful alliances but have also expanded into terminal operations and other logistics services. This growing vertical integration allows carriers to exert control over multiple layers of the logistics chain, limiting the ability of independent freight forwarders and shippers to access alternative services or negotiate fair terms—especially during periods of disruption.

CLECAT emphasises the need for active enforcement of EU competition rules to maintain a level playing field for logistics providers and ensure open and fair access to port services.

To ensure fair competition, the EU must secure a level playing field by mitigating market distortions through harmonised taxation rules – both between EU and non-EU ports and among EU port stakeholders.

Within the EU internal market, competition between different types of port stakeholders is increasingly distorted by unequal fiscal treatment. In some Member States, tonnage tax schemes—originally designed to apply to maritime transport—have been extended to cover revenues from terminal operations and cargo handling, particularly where these services are provided by vertically integrated shipping lines. This gives carrier-controlled terminals a significant advantage over independent operators and logistics service providers, who remain fully subject to corporate income tax. Such asymmetries undermine fair competition and threaten the diversity and resilience of the EU port and logistics ecosystem.

To address these imbalances, the EU should clarify and revise the Maritime State Aid Guidelines to ensure that tonnage tax regimes apply exclusively to vessel-related income and do not extend to port services. It should also enhance transparency in the application of national tax regimes, allowing for better oversight and comparability.

Beyond the internal market, EU ports are also exposed to competitive pressure from non-EU ports that are not subject to the same environmental obligations. The introduction of the EU Emissions

Trading System (ETS) for maritime and the FuelEU Maritime Regulation, while necessary for decarbonisation, may lead to a risk of carbon and traffic leakage if ships reroute to non-EU ports to avoid compliance costs. Without appropriate measures to monitor and address such diversion effects, there is a danger that ambitious EU climate policies could unintentionally undermine the competitiveness of EU ports and distort trade flows.

Further digitalisation and data sharing in port communities

Digitalisation of port operations is essential for the smooth functioning of the entire supply chain. To strengthen competitiveness, CLECAT calls for a structured approach to port digitalisation, enhanced business-to-business data sharing, and full interoperability of systems. The focus should be on connecting existing digital platforms, such as port community systems, and ensuring interoperability while avoiding unnecessary complexity. Enhanced data sharing is crucial but must be balanced with strong cybersecurity measures to protect commercially sensitive information. The Digital Transport and Logistics Forum (DTLF) plays a key role in coordinating these efforts.

The lack of effective real-time communication between terminals, carriers, and shippers is also a prominent issue to tackle. With the proper system integrity measures, this is essential to reduce cascading disruptions and unnecessary costs, thereby enhancing visibility and transparency across the logistics network.

Invest in transport infrastructure, including hinterland connections

Strengthening multimodal connectivity in the waterborne sector requires targeted investment in the trans-European transport network (TEN-T) to ensure seamless and resilient links across transport modes and to allow for Europe's military mobility and preparedness. According to the Draghi report, completing the TEN-T will require €550 billion by 2030, highlighting the urgent need for financial commitments. Addressing bottlenecks at key hubs and corridors, expanding multimodal terminals, ensuring or improving connectivity with high-capacity and efficient modes of transport such as rail and wherever applicable inland waterways, will contribute to enhance the transport services connecting ports to the hinterland. In addition, enabling customs procedures to be conducted further inland could enhance the efficiency of cargo movements and alleviate pressure on port facilities. Increasing the multimodal capacities within and beyond the EU's ports thanks to an international approach to capacity management and utilisation as well as cross-border interoperability, will prevent congestion, optimise logistics flows and increase the resilience of the networks.

Against this background, public funding must remain a cornerstone of transport investment: a strong, centrally coordinated European transport funding instrument, (CEF), must be safeguarded and strengthened to ensure long-term financial stability and avoid fragmentation of national funding programmes. Innovative private financing schemes (public private partnerships, loan guarantees...) must be developed to ensure strong and reliable business cases, improving risk-sharing mechanisms and unlock large-scale investments.

CLECAT also supports the call for a clear and ambitious EU State Aid Framework for ports that reinforces competitiveness while enabling the sector to contribute to EU policy goals, including decarbonisation, military mobility, and supply chain resilience. This framework should establish clear, fair, and transparent rules for Member States to support investment in sustainable and innovative projects. It should also establish the list of funding schemes, financing mechanisms, and any State aid

measures at the disposal of Member States to boost the competitiveness of EU ports and strengthen their position against their third country competitors.

Driving sustainability and energy transition of EU ports

CLECAT fully supports Europe's transition towards climate neutrality, and ports have a crucial role to play in the sustainable transition of the European economy, notably by becoming clean energy and industrial hubs. Nevertheless, we stress the need for pragmatic, enabling conditions that allow ports to manage the green transition effectively.

Accelerating the availability of renewable fuels and clean energy infrastructure in ports is crucial for supporting Europe's ambitious climate targets. This includes shore-side electricity (OPS), hydrogen, and e-fuels for both maritime and hinterland operations. Permit-granting procedures must be streamlined, and State aid rules should actively support the production and deployment of alternative fuels across the EU port ecosystem. In parallel, partnerships with ports in third countries should be encouraged to ensure the availability of such fuels for European trade lanes. To this end, the Commission initiative on Green Shipping Corridors under the framework of Global Gateway provides the adequate platform to develop these partnerships.

The EU Ports Strategy should also align with the upcoming Sustainable Transport Investment Plan to ensure that European ports fulfil their strategic role in the production and distribution of sustainable fuels, as well as with the Affordable Energy Action Plan to address high energy prices and prevent structural disadvantages for European ports. This alignment is particularly crucial in the coming years, as the early scale-up phase of renewable and low-carbon sources is still underway.

Investment in multimodal transport infrastructure – rail, inland waterways, and pipelines – is essential to support resilient and sustainable logistics. Ports play a central role in enabling these connections and must be adequately equipped and connected to facilitate seamless modal shifts. In this context, the development of short sea shipping routes within the EU and with neighbouring countries should be prioritised as an integral part of port operations and hinterland connectivity. These routes, framed within the European Maritime Space, offer sustainable alternatives to road transport and strengthen the role of ports as multimodal hubs within the TEN-T network. To accelerate such developments, the simplification of licensing procedures and State aid rules is needed, alongside access to sustainable financing instruments such as green bonds and sustainability-linked loans for maritime and multimodal infrastructure projects.

As noted above, CLECAT supports EU instruments such as FuelEU Maritime and the EU ETS for shipping, which create a framework for emission reduction through clear incentives. However, their implementation must not result in carbon leakage or competitive distortions at the expense of EU ports. The recent agreement at the International Maritime Organisation on global shipping decarbonisation provides a vital reference point. Future revisions of the ETS and FuelEU Maritime should reflect these international developments to ensure a fair, effective, and future-proof transition. The risk of strategic re-routing or evasive port calls, as already flagged in early ETS implementation, will only grow unless global rules catch up. The upcoming reviews of ETS and FuelEU Maritime must therefore take this global framework into account to support real emissions reductions, maintain a level playing field, and ensure that the transition to zero-carbon shipping is effective, fair, and future-proof. In addition, anti-circumventing measures such as the list of neighbouring transshipment ports,

must be reinforced with a thorough monitoring of non-EU ports close to EU waters, some of which already have the infrastructure capacity to manage higher volume of transhipped containers.

Ensuring port security and network resilience

Ports, as vital hubs of international commerce and logistics, face ever-increasing security challenges that range from cyber threats to physical breaches and criminal activities. Ensuring the security and resilience of ports has never been more critical for safeguarding operations and supply chain integrity.

Ports will need to strengthen cybersecurity and ensure critical infrastructure protection against emerging threats. Criminal infiltration, trafficking and organised crime pose serious risks to commercial supply chains and strategic defence logistics. CLECAT strongly supports the ongoing work of the European Ports Alliance as a basis for a broader, systemic security upgrade across Europe's maritime gateways. This public-private partnership will strengthen the resilience of ports and step up the fight against drug trafficking and criminal infiltration by identifying vulnerabilities, sharing best practices, and finding practical solutions to strengthen port security. This model must also be scaled to a network level to prevent the displacement of vulnerabilities from one port to another.

In strengthening port security, it is essential to harness the potential of digital innovation to enhance situational awareness and threat detection. Smart surveillance systems, including sensors, drones, digital twins, and AI-powered monitoring tools, can provide real-time visibility across port operations, enabling early detection of anomalies and faster, coordinated responses. Such technologies improve both physical and cyber resilience by supporting the secure functioning of critical IT and operational systems. To support this, the EU should encourage investment in digital capabilities through harmonised standards, interoperable systems, and cross-border data exchange frameworks.

However, a robust physical or digital infrastructure alone is not enough. European ports must also prioritise interoperability, streamlined procedures, and operational coordination, particularly at Customs and border crossing points. Implementing harmonised processes for Customs and Sanitary and Phytosanitary (SPS) checks at EU level would enhance fair competition among ports and reduce incentives for the displacement of criminal activities. Efficient capacity management and swift clearance procedures are essential to ensuring both resilience and competitiveness.

Strengthening security also requires close cooperation among all actors in the port ecosystem. Port authorities, terminal operators, freight forwarders, customs, and enforcement agencies must work together in joint initiatives to build trust, share threat intelligence, and coordinate on prevention and response. Building on the European Ports Alliance, the EU should promote structured multi-stakeholder security governance at port level to translate European objectives into practical, effective measures on the ground.

CLECAT encourages exploring the broader implementation of background checks and vetting procedures for port workers, particularly those with access to critical or sensitive areas. Freight forwarders have experience with these requirements in the air freight business and consider that this could be mirrored in the ports sector. Port workers in Rotterdam are already subject to checks against criminal-related acts, and this practice could be considered for adoption in other EU ports. This should go hand in hand with stronger access control technologies and harmonised credentialing systems to prevent abuse and enhance overall port security.

Foreign Direct Investments

As ports increasingly serve as critical nodes in both commercial and strategic supply chains, the security implications of foreign direct investment (FDI) must be carefully managed. While maintaining openness to international capital remains important for the development of port infrastructure, swift and effective FDI screening mechanisms are essential to safeguard strategic assets and critical functions. The EU should promote a harmonised framework that enables Member States to assess security risks linked to foreign investments, without discouraging legitimate economic activity.

In parallel, controls must extend beyond ownership structures to include restrictions on sensitive equipment, technologies, and systems that may pose cybersecurity or physical security threats. This includes addressing equipment access not only within port premises but also in connected hinterland infrastructure. Implementation of the NIS2 and the Critical Entities Resilience Directives and alignment with CEN standards can help ensure that all port-related technologies meet robust safety and cybersecurity requirements. These measures are critical to preventing systemic vulnerabilities and reinforcing the overall resilience of Europe's maritime gateways.

Workforce and Skills Development

The port ecosystem relies on a diverse and skilled workforce, including seafarers, researchers, dockers, port personnel, service providers, and logistics professionals who are central to its operation and resilience. Ongoing labour shortages in the logistics sector are a significant risk to the sector's performance and competitiveness. Ensuring attractive, fair, and future-oriented working conditions not only supports innovation but also rewards companies that act responsibly.

To this end, it is vital that future EU strategies include a strong social and labour component, developed in close collaboration with social partners and in line with the forthcoming Quality Jobs Roadmap. This includes promoting decent work, fostering social dialogue, and investing in training and reskilling. CLECAT welcomes initiatives such as the European Skills Agenda and the Pact for Skills and emphasises the importance of equipping workers with expertise in digital logistics, Customs procedures, and cybersecurity to prepare for emerging challenges. Further efforts could include simplifying administrative barriers to cross-border labour mobility and fast-tracking the recognition of qualifications from non-EU countries to help ease workforce shortages across the logistics chain.

Conclusion

CLECAT urges the European Union to adopt a comprehensive and forward-looking Ports Strategy that addresses structural challenges, enhances competitiveness, and ensures sustainability and security. Focusing on digitalisation, open and fair access to services, State aid rules, renewable fuels, and robust security measures will help the EU strengthen its ports and ensure they remain central nodes in the wider logistics network. CLECAT stands ready to contribute to the development and implementation of this strategy to achieve a resilient, efficient, and sustainable European maritime logistics system. This strategy will not only benefit the logistics sector but also support the broader EU policy goals of decarbonisation, military mobility, and supply chain resilience. We urge policymakers to incorporate these priorities into the EU's broader industrial, transport, and sustainability agenda, ensuring that the waterborne ecosystem remains innovative, resilient, and competitive.