

Brussels, October 2025

BSP Position Paper: Military Mobility package

Business & Science Poland

This position paper is submitted on behalf of Business & Science Poland (BSP) in response to the European Commission's Call for Evidence on the "Military Mobility package". It addresses the Commission's identified areas of concern drawn from industry experience.

Background

The European Union plays an important role in supporting the alignment of civilian infrastructure with military mobility requirements. Business & Science Poland (BSP) welcomes the European Commission's initiative to address military mobility challenges in Europe. We strongly support efforts to eliminate barriers that hinder the swift movement of troops and equipment across EU territory. We also value the EU's role in aligning civilian infrastructure with military requirements, through instruments like the Connecting Europe Facility (CEF) and coordinated policy measures, which has helped create more interoperable, dual-use transport systems that serve both civilian needs and Europe's defence readiness. As a complementary, the Commission shall consider recognising liquid fuels – both conventional and renewable/low-carbon that ensure unrivalled energy density and integration in the existing infrastructure. Ensuring long-term security of supply of liquid fuels for military and crisis management purposes is also of one of the highest decrees of importance.

Drawing on insights from Poland's ongoing strategic transport projects and experience in developing dual-use transport infrastructure, BSP offers the following insights into how future EU policy can better align infrastructure development with military mobility and civil protection objectives, and recommendations, aligned with the identified regulatory, infrastructure, and capability gaps.

Key BSP recommendations

Military Mobility package:

- Any potential modifications to the current technical requirements for dual-use infrastructure, should reflect the context of greenfield infrastructure projects that are already being developed.
- Establish a cohesive, simplified regulatory and administrative system across Member States, according to military mobility and dual use demands.

- **Sustained funding:** enhanced allocation in the next Multiannual Financial Framework (2028–2034) maintaining, or where possible, reinforcing, funding envelopes will be key to achieving the EU’s strategic objectives in the area of military mobility.
- **Greenfield eligibility:** EU funding should support new (“greenfield”) dual-use transport infrastructure projects, not just upgrades of existing assets, to ensure seamless, future-proof military mobility by integrating dual-use requirements from the earliest stages of planning, design, and construction.
- **Dual-use:** inclusion of dual-use airport infrastructure, particularly non-commercial components, within the scope of eligibility for EU support under the Military Mobility framework.
- **Ensuring security of supply of liquid fuels for military and crisis management purposes:** long-term security of supply of liquid fuels for military and crisis management that covers development and modernisation of both distribution and storage network allowing proper and secure functioning of military and civilian sectors.

Detailed Recommendations

1. Regulatory and Procedural Gaps

1.1. Technical parameters

BSP recommends that any potential modifications to the current technical requirements for dual-use infrastructure, as set out in Commission Implementing Regulation (EU) 2021/1328, reflect the context of greenfield infrastructure projects that are already being developed. These provisions have provided a clear and predictable framework for project promoters, guiding the planning and design of infrastructure that is progressing towards the construction phase. Given the long lead times associated with large-scale transport investments, it is essential that any future adjustments to technical standards do not significantly deviate from the parameters currently in place. This will help safeguard the continuity of planning processes, protect project timelines, and support the achievement of EU objectives in both transport and defence policy. Ensuring regulatory predictability is key to maintaining legal certainty and the efficient use of EU funding for dual-use infrastructure.

1.2. Procedural, operational and technical interoperability

BSP welcomes the initiative to establish a cohesive, simplified regulatory and administrative system across Member States, according to military mobility and dual use

demands. In particular we support already existing regulatory proposals improving procedural, operational and technical interoperability, including (a) harmonization of transport regulations and standards for the Trans-European Transport Network (TEN-T), (b) cross-border integration enhanced by the Capacity Regulation, (c) European Single Sky and Single European Railway Area initiatives, (d) European Rail Traffic Management System (ERTMS) as well as Operation and Traffic Management TSI.

2. Infrastructure and Dual-Use Investment Gaps

2.1. EU financing for Military Mobility

BSP welcomes the European Commission's proposal for continued and enhanced funding for military mobility under the Multiannual Financial Framework (2028–2034) and the (CEF) supporting dual-use infrastructure investments in the TEN-T. The proposed increased allocation reflects the growing recognition of transport infrastructure as a critical enabler of Europe's security and defence capabilities. Ensuring adequate and predictable financial support for dual-use infrastructure is essential to sustain momentum, provide investment certainty, and deliver projects that meet dual-use needs. As negotiations progress, maintaining, or where possible, reinforcing, funding envelopes will be key to achieving the EU's strategic objectives in the area of military mobility. It is equally important that greenfield projects at the planning, design, and construction stages remain eligible for EU support to ensure coherence, continuity, and long-term impact across the Union's transport network

2.2. Eligibility of Planned and Ongoing Investments

BSP strongly advocates recognizing dual-use greenfield transport infrastructure projects at all stages: planning, design and construction. Limiting EU support solely to the modernization of existing infrastructure would overlook the strategic value of new investments developed with dual-use functionality integrated from the outset. Such a restrictive approach risks falling short of meeting the evolving operational requirements of military mobility across Europe.

While upgrades to existing infrastructure remain important, they often face physical and technical constraints, such as insufficient load-bearing capacity of bridges, limited clearance in tunnels, or suboptimal location of key nodes, that are not always economically or technically feasible to resolve. Moreover, targeted modernization can only be effective if all critical bottlenecks along a corridor are identified and addressed. Given the complexity and scale of pan-European routes, there is a significant risk that even after selective upgrades, corridors may remain operationally unsuitable for military transport due to obstacles, that for various reasons, could not be resolved.

Consequently, despite considerable pointwise investments, the overarching goal of seamless military mobility within the EU transport network may not be fully achieved. In light of these limitations, investing in new ("greenfield") dual-use projects, such as railway lines or multimodal transport hubs, offers clear advantages. Greenfield investments enable the design of infrastructure from the ground up to meet both civilian and military requirements without the constraints imposed by legacy conditions. This approach allows for optimal routing, full technical compliance with dual-use standards and better integration within the broader network. As a result, newly built infrastructure can provide continuous, uninterrupted corridors throughout their entire length, ensuring seamless military mobility with greater operational reliability and long-term cost efficiency — objectives that are difficult to realize through partial or constrained upgrades alone. Importantly, newly built infrastructure ensures operational readiness without disrupting ongoing traffic or compromising long-term performance. In contrast, modernizing existing assets, such as bridges, tunnels, or sections of railway lines to accommodate heavy military equipment, often involves extended service interruptions. To conclude, incorporating military mobility requirements early in the project lifecycle: during planning, design, and construction; enhances coherence, reduces costs, and ensures technical alignment. For these reasons, it is essential that EU support remains accessible to dual-use infrastructure projects throughout all development stages, not only to accelerate delivery but also to guarantee that future assets contribute as effectively as possible to both civilian and defence objectives.

2.3. Ensuring eligibility of non-commercial airport infrastructure in dual-use projects

BSP encourages the inclusion of dual-use airport infrastructure, particularly non-commercial components, within the scope of eligibility for EU support under the Military Mobility framework. Civilian airports that are designed or upgraded to serve defence needs play a vital role in enhancing the strategic reach, responsiveness, and resilience of the EU's transport network. Key elements such as runways capable of handling heavy military aircraft, reinforced aprons for staging and refuelling, secure perimeter fencing, dedicated access roads, fuel storage facilities, air traffic control and communication systems are indispensable for enabling military air operations. However, these components are often classified as non-commercial and may fall outside the scope of eligibility under traditional transport funding instruments. Ensuring that such infrastructure is eligible for EU support would help maximise the dual-use potential of airport investments, strengthen the EU's rapid deployment capabilities, and foster better civil-military interoperability across the Union.

2.4. Long-term security of supply of liquid fuels

BSP strongly supports long-term security of supply of liquid fuels, both conventional and renewable/low-carbon, in order to ensure energy density, integration in the existing infrastructure and more independence accompanying a secure supply chain for imports. Development and modernisation of both storage and distribution network shall also encourage use of dual-use projects, splitting costs on many verified, reliable partners, given lessons learned from global crises (especially arising from the war in Ukraine).

Conclusion

Business & Science Poland fully supports the European Commission's ambition to enhance military mobility across the Union. The proposals set out in this submission illustrate how strategic dual-use infrastructure, particularly greenfield investments, can play a role in delivering a resilient and interoperable transport network that serves both civilian and defence objectives. Continued EU support, regulatory stability, and inclusive eligibility criteria will be essential to ensuring coherence and long-term impact.

About BSP

Business & Science Poland (BSP) combines the experience of leading Polish enterprises with the EU agenda. We represent the knowledge and interests of Polish companies employing over 280,000 people in Poland, the EU, and globally. Our goal is to support the EU Single Market in line with the need for its responsible and effective transformation. This opinion presents the position of BSP members representing the digital, financial, air transport, fertiliser, chemical, mining, refining, fuel and energy sectors.