

Special report

## EU military mobility

Full speed not reached due to design weaknesses and obstacles en route



EUROPEAN  
COURT  
OF AUDITORS

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## **Abbreviations**

## **Glossary**

## **Replies of the Commission and the European External Action Service**

## **Timeline**

## **Audit team**

## Executive summary

**I** The objective of military mobility in the EU is to ensure swift and seamless movement of military personnel, materiel, and assets within and beyond the EU. Legally, territorial defence is a competence of the 27 EU member states, 23 of which are also members of NATO. The EU is a relatively new stakeholder in this area.

**II** Following a first EU action plan on military mobility in 2018, the European Commission and the High Representative/Vice-President jointly published the second action plan on military mobility (Action Plan 2.0) on 10 November 2022 covering the period 2022-2026. Military mobility has become particularly relevant in light of Russia's war of aggression against Ukraine and the issues encountered by armed forces in this area in the EU. We therefore consider it timely to carry out an audit on Action Plan 2.0 and the first EU budget for military mobility, which includes a €1.69 billion allocation under the Connecting Europe Facility for the 2021-2027 multiannual financial framework (MFF). Our audit provides an opportunity both to improve implementation in the current MFF and to prepare for the next programming period.

**III** We assessed whether Action Plan 2.0 was built on solid foundations and was on track to reach its objectives. Overall, we conclude that Action Plan 2.0 lacked sufficiently solid foundations, and progress towards its objectives has been variable. The Commission consulted all key stakeholders to develop the action plan but did not make a robust estimate of the funding required to reach the objectives set.

**IV** We found that governance arrangements for military mobility in the EU are complex. There is no single point of contact for military mobility measures. This makes it difficult for stakeholders, such as ministries of defence, to know who does what in relation to military mobility. The European Parliament has partial oversight of military mobility in the EU.

**V** The design of Action Plan 2.0 resulted in limitations regarding monitoring and reporting and a majority of its actions were not sufficiently operational. Action Plan 2.0 was not focused enough and included too many actions. The plan includes EU-level actions for EU stakeholders, as well as non-binding invitations for member states to act.

**VI** All stakeholders welcomed the military mobility funding introduced in the 2021-2027 MFF as a first step, albeit a modest one. The Commission front-loaded the available amounts into the 2022 and 2023 military mobility calls. This means that no more dedicated funding for dual-use infrastructure will be available until the end of the current

MFF. However, the potential applicants for general Connecting Europe Facility transport calls are often the same as those for the military mobility calls.

**VII** For the three military mobility dual-use infrastructure calls, we found that the military assessment only accounted for a small part of the overall assessment score in the selection process. Geopolitical aspects were also not sufficiently considered. There is therefore a risk of the EU funded dual-use projects selected not being the most relevant from a military perspective.

**VIII** After the launch of the third and last call in 2023, however, the Commission, with contribution from member states, carried out a gap analysis with a view to setting up a plan to address the priority infrastructure gaps and quantify the EU funding needed for the next MFF.

**IX** The first progress report for the action plan, published in November 2023, did not systematically include progress information, including on issues encountered, for each action but was more of a list of what had happened in terms of military mobility in the EU during the previous year. Member states were not asked to specifically give feedback via a formalised process on their invitations to act. Overall, we found that only four of the 29 key actions at EU level could be considered completed, while the vast majority remained a work ongoing. There is a lack of indicators and specific targets (with corresponding date), to be achieved for all actions. We therefore cannot give a precise overall assessment of the progress made on Action Plan 2.0, beyond indicating that implementation of actions is ongoing and progress has been variable.

**X** On the basis of these conclusions, we recommend that the Commission and the European External Action Service:

- improve the governance arrangements for military mobility in the EU;
- monitor and report on the progress of each action included in Action Plan 2.0;
- assess the possibility of using Connecting Europe Facility transport calls to finance dual-use infrastructure projects under the current MFF (2021-2027);
- take steps to improve the predictability of possible funding for military mobility under the post-2027 MFF;
- improve the selection process for dual-use infrastructure projects under the post-2027 MFF;
- make the design of the EU's military mobility actions more focused.

# Introduction

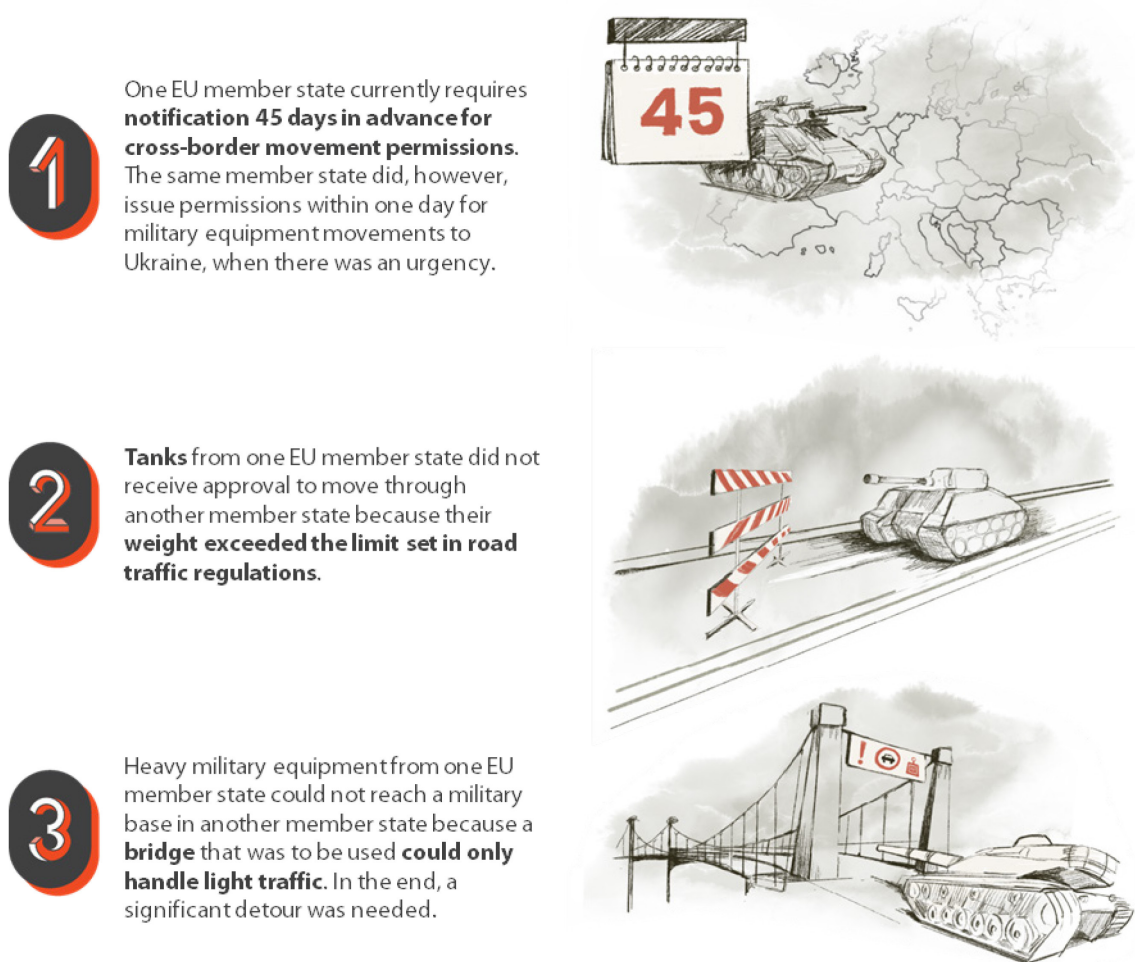
**01** Military mobility refers to the aim of swiftly and seamlessly moving military personnel, equipment and assets at short notice and on a large scale – within and beyond the EU<sup>1</sup>. It includes harmonising rules across EU member states and exploring the potential for a [civilian-military approach](#) to infrastructure development. According to the EU Treaties<sup>2</sup>, “the Union’s competence in matters of common foreign and security policy shall cover all areas of foreign policy and all questions relating to the Union’s security, including the progressive framing of a common defence policy that might lead to a common defence”. The Treaties do not specifically refer to military mobility. [Figure 1](#) includes some practical examples of military mobility issues. The EU’s strategic need for military mobility has become even more urgent in light of Russia’s war of aggression against Ukraine, which started in February 2022. [Annex I](#) shows a timeline of military mobility developments in the EU since 2017.

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<sup>1</sup> Commission press release: “[Military Mobility: EU proposes actions to allow armed forces to move faster and better across borders](#)”.

<sup>2</sup> See for example, the [consolidated version of the Treaty on European Union](#) Article 24.

**Figure 1 – Examples of military mobility issues in the EU**



*Note:* Due to the sensitive nature of this topic, we do not identify the stakeholders concerned.

*Source:* ECA.

**02** The European Defence Agency (EDA) (see [Annex II](#)), in its [Coordinated Annual Review on Defence \(CARD\)](#), identified enhanced military mobility as one of six focus areas in which participating member states need to prioritise their development efforts. The 22-long-standing priorities set out in its [2023 revision of the Capability Development Plan](#) include military mobility, as a strategic enabler.

## The first action plan on military mobility in 2018

**03** President Juncker's [State of the Union address of 13 September 2017](#) stressed the imperative of creating a fully-fledged European Defence Union by 2025. Two months later, in November 2017, the Commission and the European External Action Service (EEAS) issued a joint communication entitled "[Improving military mobility in the European Union](#)". Building on this communication, the Commission published a [first action plan on military mobility in March 2018](#). [Figure 2](#) below presents its key actions:

**Figure 2 – First action plan on military mobility (2018) – Key actions**

**Agreeing on military needs**

Identifying and agreeing military requirements

**Assessing transport infrastructure for military use**

For transport infrastructure, evaluating to what extent the existing transport infrastructure prioritised by the trans-European transport network (TEN-T) regulation across all modes of transport and its technical requirements are relevant and sufficient for military transport

**Aligning military and EU transport regulations**

For regulatory and procedural issues, aligning the rules applicable to military forces with existing EU legislation to increase safety and provide synergies and consistency for the transport of dangerous goods in the military domain, without weakening civilian standards

**Clarifying customs and VAT for military goods**

For customs and value-added tax (VAT), clarifying the use of the documentation for temporary export and re-import of military goods (known as “form 302”) by or on behalf of the armed forces of the EU member states and aligning the VAT treatment of EU defence efforts with that of NATO efforts

**Facilitating cross-border military movement**

Supporting the EU member states in developing arrangements regarding permission for cross-border movement

Source: ECA.

**04** The High Representative of the EU for Foreign Affairs and Security Policy (HR/VP) and the Commission presented periodic progress reports in [June 2019](#), [October 2020](#) and [September 2021](#). The third report featured a number of developments, including that [military requirements for military mobility within and beyond the EU](#) were developed and used to define dual-use requirements – technical standards for projects that can fulfil both civilian and military purposes – for transport infrastructure. The report also flagged that customs formalities for cross-border military movements had been simplified while ensuring synergies with NATO. Finally, it stressed that the transport of dangerous goods in the military domain had been harmonised. The Commission decided not to issue an annual implementation report in autumn 2022 as it planned to publish a new action plan on military mobility in November of that year.



## The Action Plan on Military Mobility 2.0

**05** The [Strategic Compass on Security and Defence](#), which the European Council endorsed in March 2022 included the objective for member states to agree on an “ambitious, revised Action Plan by the end of 2022” to take account of “new commitments with the aim to substantially enhance and invest in military mobility”. On 10 November 2022, the European Commission and the HR/VP jointly published the new [Action Plan on Military Mobility 2.0](#) (Action Plan 2.0).

**06** Building on the achievements of the first action plan, Action Plan 2.0 covers the period 2022-2026. It includes 38 actions – 29 EU-level actions and nine addressed to the member states. These are divided into four main pillars, the last two (III and IV in [Figure 3](#)) being new ones:

**Figure 3 – Action Plan 2.0’s four main pillars**



*Note:* For further information on “solidarity lanes”, see [COM\(2022\) 217 final](#).

*Source:* ECA.

## A budget for dual-use transport infrastructure to support military mobility in the 2021-2027 multiannual financial framework (MFF)

**07** The EU budget funds military mobility infrastructure under pillar I of Action Plan 2.0. In addition, pillar II covers European Defence Fund projects on military mobility. No EU funding is envisaged for the implementation of pillars III and IV.

Action Plan 2.0 stated that the military requirements (see paragraph 04) were around 95 % consistent with NATO's requirements. Subsequent analysis by the Commission and the EEAS found a 94 % overlap between the EU military mobility network and the TEN-T network (combined average for all modes), meaning that transport infrastructure on the TEN-T network would directly improve military mobility.

**08** The 2021-2027 MFF is the first to include a dedicated budget for dual-use transport infrastructure projects, which amounts to €1.5 billion (€1.69 billion in current prices) and is provided under the Connecting Europe Facility (CEF) Regulation. The CEF is a funding instrument providing €25.81 billion over the 2021-2027 period for strategic investment in EU transport infrastructure. The Commission's initial proposed budget for dual-use transport infrastructure had amounted to €5.8 billion in 2018 prices (€6.5 billion in current prices)<sup>3</sup>. The reasons why the final budget was much lower include the impact of COVID-19 on the 2021-2027 MFF. This major cut was considered by analysts to go against the EU's crucial need for military mobility<sup>4</sup> and was criticised by the European Parliament<sup>5</sup>. To put this amount into perspective, EDA's "[Defence Data 2022](#)" report shows that the EU member states' total defence expenditure in 2022 alone was €240 billion.

**09** Three successive CEF military mobility calls for proposals were launched in [September 2021](#), [May 2022](#) and [May 2023](#), respectively. Following the first call, the budget for the second call was almost doubled in order to frontload military mobility funding in the context of the war in Ukraine. The remainder of the budget available for the 2021-2027 MFF was allocated to the 2023 call. The outcomes of the three calls are summarised in [Figure 4](#).

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<sup>3</sup> See [Special meeting of the European Council \(17, 18, 19, 20 and 21 July 2020\) conclusions](#), point 116, and [European Parliament Briefing "Security and defence Heading 5 of the 2021- 2027 MFF"](#) PE 690.545, April 2021.

<sup>4</sup> See "[Military Mobility: Ambition versus Reality](#)" by Teresa Usewicz, Andrzej Czekaj and Witold Bartoszek, 2022, and "[Europe's military mobility: latest casualty of EU budget battle](#)" by Alexandra Brzozowski, 25 February 2022.

<sup>5</sup> European Parliament resolution of 17 February 2022 on the implementation of the Common Security and Defence Policy – annual report 2021 ([2021/2183\(INI\)](#)).

Figure 4 – CEF military mobility calls for proposals



*Note:* Data based on the CINEA dashboard as at the end of August 2024. The planned project end dates range from December 2026 to December 2027 for the three consecutive calls.

*Source:* ECA.

**10** The [mid-term revision of the 2021-2027 MFF](#), agreed on 28 February 2024, included no additional funding for dual-use military mobility infrastructure projects. It did, however, include an increase of €1.5 billion for the [European Defence Fund](#)<sup>6</sup> (EDF), which finances defence research and development projects. The annex to the [Commission's proposal](#), published on 20 June 2023, explained that “in the future, it will be challenging to finance any additional initiative under Heading 5, dedicated to Security and Defence, which is the smallest of all MFF headings. ... no reserves are available, and the margins are exhausted...”.

## The European Defence Fund finances defence research and development projects related to military mobility

**11** Action Plan 2.0 refers, under “Regulatory support measures”, to the “[Secure Digital Military Mobility System](#)” (SDMMS) project, selected for funding under the 2021 EDF call. This €9 million project started on 1 December 2022 and is coordinated by an Estonian private research and development company working in the field of information and communication technology. The other project participants come from Bulgaria (two companies), Czechia, Germany, Latvia, Lithuania, Luxembourg, Norway, Poland and

<sup>6</sup> [Council press release](#) on the mid-term revision.

Romania. The project's aim is to facilitate the direct and secure exchange of information between governments requesting and approving military movements.

**12** Military mobility has continued to be included in the latest versions of the EDF's long-term plan, published in [March 2023](#) and [March 2024](#) respectively. Additional EDF military mobility projects may be financed until the end of the MFF.

## Latest developments

**13** In June 2024, the European Parliament and the Council adopted a [revised TEN-T Regulation](#), which for the first time also reflects the aim of military mobility in the TEN-T network. With a view to further aligning standards between the TEN-T network and the EU military transport network, on 23 October 2023 the Council adopted revised military requirements. The expanded military requirements notably encompass logistic hubs and fuel supply-chain infrastructure, in light of Russia's war of aggression against Ukraine.

**14** A [joint report to the European Parliament and the Council on the implementation of Action Plan 2.0 from November 2022 to October 2023](#) was issued on 13 November 2023. The next progress report was due to be presented by the HR/VP and the Commission by the end of November 2024. This is the main document published on the action plan's monitoring.

**15** In its conclusions on EU security and defence of 27 May 2024, the Council included a [new "military mobility pledge 2024"](#). It also invited stakeholders at EU level to coordinate the regular stocktaking of progress made, with a view to the full and comprehensive implementation of the military mobility pledge by 2026.

## Audit scope and approach

**16** We decided to carry out an audit of military mobility in the EU, as it is now a crucial and priority element of the EU's defence capabilities in light of Russia's war of aggression against Ukraine. The present moment is an appropriate one to look at Action Plan 2.0 and the first EU budget for military mobility, as our audit provides the opportunity both to improve implementation under the current MFF and to prepare for the next programming period.

**17** The objective of the audit was to assess whether Action Plan 2.0 has been built on solid foundations and was on track to reach its objectives. This is our second special report on EU actions and spending in the area of defence. [The first report on defence research financed by the EU budget](#) included a recommendation to design a long-term strategy for the EDF. In addition, we have issued an [opinion concerning the European Defence Industry Programme](#).

**18** To answer the main audit question, we asked the following sub-questions:

- (1) Is the governance for military mobility actions and spending in the EU clear and are suitable accountability arrangements in place?
- (2) Is Action Plan 2.0's design conducive to achieving the overall objective of having a "well-connected military mobility network, with shorter reaction times"?
- (3) Is Action Plan 2.0 on track to reach its objectives, for each of its four pillars?

**19** The audit covers the period from September 2021 until April 2024, and covers the three military mobility calls under the [Connecting Europe Facility 2 Regulation](#). Our audit work comprised the following:

- We met representatives from: several Commission directorates-general; the EEAS, including the EU Military Staff (EUMS); the European Climate, Infrastructure and Environment Agency (CINEA); EDA; the Permanent Structured Cooperation (PESCO) military mobility project; NATO international staff; a think-tank working on military mobility and an academic with experience in the area.
- We met representatives of the ministries of defence, transport/infrastructure and finance and the customs administrations in seven member states (Germany, Estonia, Greece, Lithuania, the Netherlands, Poland and Portugal). These member states were selected on the basis of several criteria, including geographical coverage, proximity to the EU's eastern borders and the materiality of projects. Though the member states were not our auditees, we consulted them to receive feedback and

corroborative evidence, including through a questionnaire. Our assessment of progress made on member states' invitations to act is based on feedback obtained from the member states visited.

- We also visited dual-use infrastructure projects funded by the EU through the 2021 or the 2022 military mobility calls in five of these member states (Germany, Estonia, Lithuania, Poland and Portugal), as well as the coordinator of the SDMMS project in Estonia. There were no EU-funded dual-use infrastructure projects from the 2021 and 2022 calls in Greece or the Netherlands.
- We carried out a documentary review of 24 dual-use infrastructure projects funded by the EU through the first two military mobility calls in 2021 and 2022.
- A panel of experts convened to discuss draft conclusions and recommendations.

**20** We have no audit rights in respect of EDA or PESCO, which are not financed by the EU budget, and are therefore outside of the scope of this audit. Due to the sensitivity of this topic, the report does not disclose certain details and references, and presents information on exchanges with member states in aggregate form only.

# Observations

## The governance of EU military mobility is complex and fragmented, with partial parliamentary oversight

**21** Accountability and transparency are indispensable for the democratic, legitimate, and effective governance of the EU. In this section of the report, we examine whether the governance of military mobility in the EU is sufficiently clear. To this end we assess whether there are clear responsibilities for military mobility including a coordination function at EU level, and what arrangements exist for oversight by the Council and the European Parliament.

### Military mobility at EU level involves many actors with partially overlapping responsibilities

**22** NATO is an intergovernmental [political and military alliance](#) and its [membership includes 23 EU member states](#). Legally, territorial defence is a competence of the 27 EU member states, 23 of which are also members of NATO. The alliance does not have its own military force; its member countries provide the personnel, equipment and supplies that make up NATO military activities. NATO does finance military projects.

**23** The EU finances civilian and dual-use projects. Its funding of dual-use military mobility infrastructure projects was welcomed by all member state representatives we met, who regarded it as complementary to NATO and inter-governmental military mobility activities. They considered that EU dual-use infrastructure projects helped enhance co-operation between ministries in member states and therefore helped promote a shift towards a [“whole-of-government”](#) approach to military mobility. They identified a further shift to a [“whole-of-society”](#) approach to military mobility – which would also involve private transportation companies and civilian transport organisations such as port authorities, sea-port terminals or railway operators – as a major objective for the future. These developments underline the growing complexity of military mobility governance, which requires coordination across multiple sectors and stakeholders.

**24** Many different bodies financed by the EU budget are involved in the Action Plan 2.0, primarily:

- (1) the EEAS, including the EUMS;
- (2) many different Commission directorates-general, in particular those for Defence Industry and Space (DG DEFIS), Mobility and Transport (DG MOVE), Taxation and

Customs Union (DG TAXUD), Communications Networks and Content and Technology (DG CNECT), as well the Commission Secretariat-General and CINEA, an executive agency.

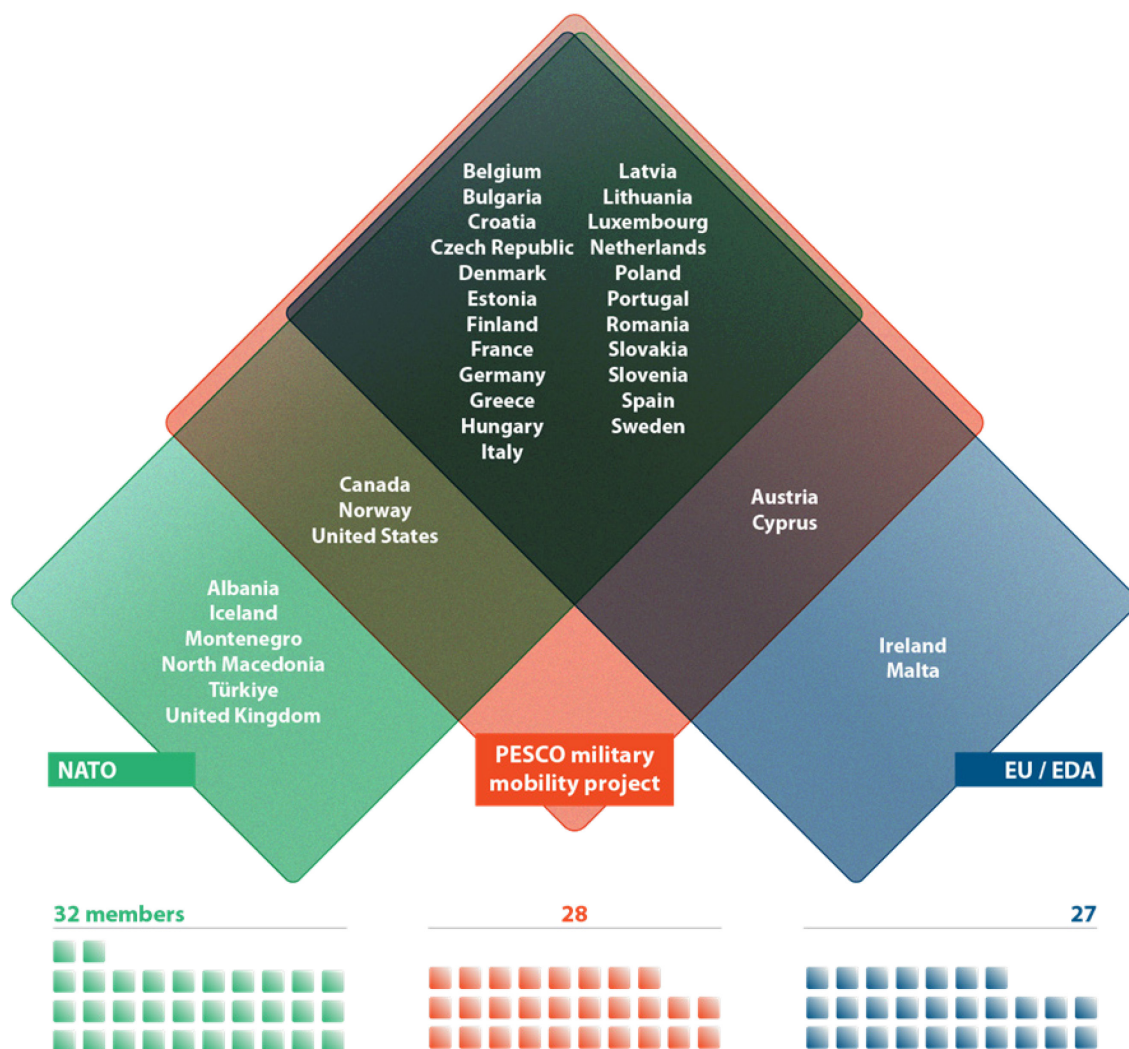
**25** EDA is an [intergovernmental agency](#) that predates any EU budget spending on defence, having been established by a [joint action of the Council of Ministers on 12 July 2004](#). Its mission is “to support the Council and the member states in their effort to improve the EU’s defence capabilities in the field of crisis management and to sustain the European security and defence policy as it stands now and develops in the future”.

**26** [PESCO](#) is a member state-driven cooperation framework. The EEAS, including the EUMS, and EDA serve jointly as the PESCO secretariat. There are currently 68 ongoing PESCO projects. The [project on military mobility](#) brings together 25 EU member states and non-EU countries to coordinate relevant national measures including those agreed by the member states in the “military mobility pledge” of 25 June 2018. The project on logistical hubs involves 16 member states working together to connect their logistical depots and capabilities to reduce response times and optimise the use of capacities.

**27** Even before the EU’s first action plan on military mobility in 2018, both EDA and the PESCO military mobility project were already working on military mobility at an intergovernmental level. The EU is a new stakeholder in this area. NATO, the EU and EDA and the PESCO military mobility project have different memberships (see [Figure 5](#)). In the area of regulatory measures, we identified overlaps (with simultaneous reporting lines and similar project scopes, including in respect of cross-border movements) between what the different stakeholders do in relation to military mobility in the EU. These were confirmed by different stakeholders, including member state representatives we consulted.



Figure 5 – NATO, EU, EDA and PESCO military mobility project members



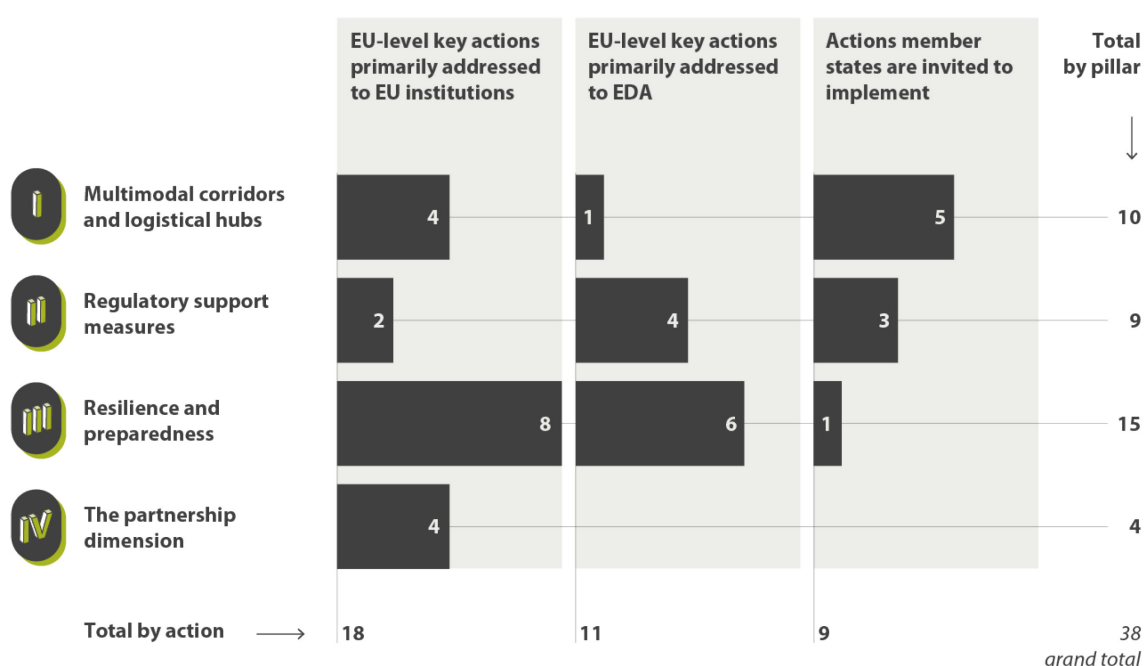
Note: Ireland is an observer for the PESCO military mobility project.

Source: ECA.

**28** Moreover, the European Investment Bank (EIB) decided in June 2023 to increase its financing for security and defence to €8 billion through its [Strategic European Security Initiative \(SESI\)](#). Military mobility is one of the activities eligible under the initiative. The EIB is not involved in any actions under Action Plan 2.0. For further information on stakeholders, see [Annex II](#).

**29** Of the 29 EU-level actions included in Action Plan 2.0 (see paragraph [06](#)), 18 (62 %) are primarily addressed to EU institutions, in particular the Commission, but also the EEAS including the EUMS (see [Annex II](#)), while the other 11 actions (38 %) are primarily addressed to EDA (see [Figure 6](#)). Two of the actions addressed to EDA are also being implemented within the PESCO framework.

**Figure 6 – Action Plan 2.0 – Addressees of planned actions**



Source: ECA.

**There is no central function or body coordinating military mobility activities in the EU and the European Parliament does not oversee all activities**

**30** We found that there is no central function or body in the EU that coordinates military mobility measures. Representatives from five member states we visited referred to the governance arrangements for military mobility in the EU, indicating that they were complex and that it was difficult to find out who did what in relation to military mobility. Member states were often not aware of the differences in accountability between bodies financed by the EU budget, such as the Commission, the EEAS or EU executive agencies, and intergovernmental entities working on military mobility in the EU. [Figure 7](#) gives an

overview of the accountability arrangements for the key military mobility institutional players in the EU. See [Annex II](#) for additional information.

**Figure 7 – Military mobility institutional players in Europe – Accountability arrangements overview**

	<i>Institutional player</i>	<b>External audit</b>	<b>EU external audit by the ECA</b>	<b>European Parliament oversight</b>	<b>Council oversight</b>
<b>Not financed by the EU budget</b>	<b>EU member states</b> (financed by the state budget only)	✓	✗	✗	✗
	<b>PESCO</b>	✓	✗	✗	✓
	<b>EDA</b>	✓	✗	✗	✓
	<b>EIB</b>	✓	✗	✗	✗
<b>Financed by the EU budget</b>	<b>EU member states</b> (beneficiaries of military mobility CEF funding)	✓	✓	✓	✓
	<b>Commission, EEAS &amp; EU, agencies</b>	✗	✓	✓	✓

Source: ECA.

**31** The European Council and the European Parliament have the power to oversee, and the ECA to audit, bodies financed by the EU budget (the Commission, the EEAS and EU agencies) or guaranteed by the EU general budget<sup>7</sup>. The Parliament therefore lacks the power to oversee PESCO projects and EDA, meaning it does not oversee all military mobility activities in the EU. The Council does, however, have oversight of EDA and PESCO.

<sup>7</sup> See [Annex II](#) for the EIB.

## The design weaknesses of Action Plan 2.0 impede implementation, effective monitoring and reporting

**32** In this section of the report, we examine whether Action Plan 2.0 is sufficiently robust. We assess whether it was prepared in consultation with the relevant stakeholders and whether it is underpinned by an evidence-based needs analysis. We also examine whether the actions it includes are the most relevant ones, and whether they are accompanied by specific measurable, relevant, and time-bound objectives together with baselines and milestones. Lastly, we assess whether reporting and monitoring arrangements are in place to oversee the implementation of Action Plan 2.0.

### Action Plan 2.0 has some design weaknesses

**33** Action Plan 2.0 recalls the achievements of the 2018 action plan, but its development was not preceded by an in-depth *ex ante* analysis and a needs assessment allowing the evaluation of a commensurate budget. The Commission directorates-general and the EEAS did not have much time to develop Action Plan 2.0 as the [Strategic Compass for Security and Defence](#), issued on 24 March 2022, included the commitment: “By the end of 2022, ... agree on an ambitious, revised Action Plan”. Nevertheless, all the member states we visited were consulted on the preparation of Action Plan 2.0. Member states and their various ministries, in particular the ministries of defence, were approached via different channels, such as their permanent representations in the EU or the PESCO military mobility project.

**34** Action Plan 2.0 can be divided into two major areas. The first concerns dual-use infrastructure projects 50 % co-financed by the EU (pillar I). The second concerns administrative and procedural aspects of military mobility (pillars II to IV). The two aspects are complementary. Different member states may consider one aspect more important than the other depending on their national circumstances (e.g. whether they have sound national transport networks).

**35** At the time Action Plan 2.0 was published, the Commission had not made a robust estimate of the overall funding required to make its objectives and targets achievable. The EEAS, including the EUMS, and DG MOVE did, however, express the intention to quantify EU funding needs for dual-use infrastructure. Member states, their ministries of defence and ministries of transport were invited to participate in a study, which included a three-step gap analysis to “set up a plan to address the infrastructure gaps, notably by quantifying the necessary EU funding under CEF III by end 2024” for the post-2027 MFF.

**36** The results of this gap analysis were due to be presented by March/April 2024. While the ministries of defence welcomed this gap analysis, some of those we consulted

wondered why it was urgent to complete it in the first half of 2024, given that no further dual-use infrastructure calls were planned for the 2021-2027 MFF as no more EU funds were available. The third and final call for EU-funded dual-use infrastructure projects closed 3 months after the study started, in September 2023. The gap analysis is meant to result in the establishment of a project list with cross-border and major national projects, identifying which of these have military value. According to the Commission, the outcome of this gap analysis will feed into the preparation of the post-2027 MFF, for which it will have to present proposals in mid-2025.

**37** The wording of the Action Plan was the result of a compromise which, while ensuring common agreement, may have diluted its overall effectiveness by accommodating the diverse positions of the 27 member states. Our assessment was corroborated by the member state representatives we met. The plan states that EU-level actors “will” undertake the actions addressed to them, but merely “invites” the member states to undertake the actions addressed to them. One reason for this is national sovereignty in matters of defence.

**38** Three of the seven member states we visited consider Action Plan 2.0 a political document communicating that the EU is active in the area of military mobility, rather than an operational document. Some tasks addressed to member states also overlap with tasks on which member states are already working or have already worked<sup>8</sup>. Only 13 of the 29 “key actions at EU level”<sup>9</sup> (i.e. less than 45 %) have target dates, in the form of a year or the end of a year. None of them have indicators accompanied by baselines or milestones. This hinders effective monitoring and reporting on progress made.

**39** Some of Action Plan 2.0’s administrative and procedural actions are implemented within EDA working groups or through the PESCO military mobility project. Six of the seven member states we visited confirmed that the strategic objectives of Action Plan 2.0 had been translated into operational objectives at national level which are included, for instance, in their national military mobility plans. [The Netherlands’ national military mobility plan](#) is the only one that is publicly available. All seven member states have different forms of working channels at national level to coordinate and discuss progress on military mobility. Four of the seven member states also monitor Action Plan 2.0’s implementation progress at national level.

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<sup>8</sup> Such as tasks arising from the [25 June 2018 Council conclusions on security and defence](#) (paragraph 18) or from different EDA working groups.

<sup>9</sup> Pillar 1: 3 out of 5, pillar 2: 4 out of 6, pillar 3: 6 out of 14, pillar 4: 0 out of 4.

## Reporting on the implementation of Action Plan 2.0 does not provide comprehensive information on progress achieved

**40** In terms of the monitoring of Action Plan 2.0, only annual progress reports are planned. Member states have no obligation to specifically report to the EU via a formalised process on the actions they are “invited” to take, and therefore do not do so. On the other hand, EDA reports to the EU institutions on the progress of the actions primarily addressed to it.

**41** The [first progress report](#) for Action Plan 2.0 was published in November 2023. It is purely for information purposes, with no further steps envisaged. Because of the way Action Plan 2.0 was set up, the report does not and cannot systematically include information on progress made to date on each individual key action at EU level, quite apart from the fact that it does not include information on the progress of the actions member states were invited to take. The document is therefore more of a list of what has happened in terms of military mobility in the EU in the past year of the reporting period without a clear reference to the actions set out in the action plan. As a result, the report does not establish whether the EU is making progress on several actions, including some under “Resilience and preparedness”.

## Progress for the four pillars of Action Plan 2.0 has been variable

**42** In this section of the report, we examine the progress made in implementing Action Plan 2.0. For pillar I, we assess whether the Commission’s allocation of EU funding to dual-use transportation projects was based on sound criteria addressing priority gaps in the most geostrategic locations in the EU. We also assess the progress made in completing actions across all four pillars of Action Plan 2.0. In addition, we summarise the feedback received on the examined member states’ progress in implementing their invitations to act.

## Pillar I – the EU provides welcome funding but there is a significant gap and insufficient focus on geopolitical and military aspects

### Limited EU budget used up before most urgent priorities determined

**43** The stakeholders we interviewed all regarded the 2021-2027 MFF’s budget of €1.69 billion for military mobility dual-use infrastructure as modest, but they also generally welcomed it as a first step in the right direction. With such an amount, they considered it a given that only small, individual projects on a TEN-T network could be financed, rather than financing even part of a corridor. The average EU funding for the 95 military mobility projects selected was €18 million. One of the admissibility and

eligibility conditions for projects was that they should be located on both a TEN-T network and the EU military network (see [Table 1](#)).

**Table 1 – 2021-2027 CEF2 military mobility main admissibility and eligibility conditions**

Admissibility and eligibility conditions – Main elements	
Admissibility conditions (extract)	
Letters of support by the member state (generally, the ministry of transport/infrastructure)	
o	Environmental compliance file for works projects and studies plus climate-proofing studies for the third call
o	Military network map declaration
Eligibility conditions (extract)	
o	Project complies with the maximum/minimum duration set out in the call conditions
o	Project is located on the TEN-T network
o	Project is located on the EU military transport network
o	Project meets at least one dual-use requirement and its corresponding value or standard as defined in the Commission Implementing Regulation (EU) 2021/1328

**44** Even individual major infrastructure projects often cost more than the €1.69 billion available for all 27 EU member states planned for the whole seven-year MFF. To further illustrate the limitations of this amount, back in 2016 the EIB noted an annual investment shortfall in the EU amounting to €80 billion to upgrade transport networks to reduce congestion costs and trade bottlenecks<sup>10</sup>. The member state ministries of defence we consulted insisted that the military's needs go beyond infrastructure on the TEN-T networks, for various reasons. These include the need for transportation to and from future military defensive positions and the need to develop local infrastructure to transport the military to the front in the event of a conflict and to evacuate civilians. However, with the level of EU funds available, it was generally understood that there were no EU funds available for such investments.

<sup>10</sup> EIB, [Restoring EU competitiveness \(2016 version\)](#), p. VIII.



**45** To take into account the evolution of the security situation in Europe following Russia's war of aggression against Ukraine, the Commission front-loaded the available amounts into the 2022 and 2023 calls. Six of the seven member states we consulted considered this to be the right approach to take, as EU-funded projects could then potentially be completed earlier. Whereas making this budget quickly available for investments in dual use infrastructure sent an important political signal from the EU, we found that it led to EU funding that was not stable and predictable, as there will be a gap of more than 4 years until the next MFF – and therefore a significant interval before any new calls and funding for dual-use infrastructure. Three of the seven member states we visited noted such “inconsistency” in the EU funding provided. Some member states we consulted also pointed out the fact that the three-step gap analysis (see paragraph 35) would not be used for years and that there would be a loss of experience, in addition to the risk of delaying important investments.

#### **Applicants for CEF transport calls and military mobility calls are often the same**

**46** The military mobility dual-use infrastructure project calls represented an opportunity for beneficiaries for different reasons:

- airport projects could be co-funded by the EU, something that had become difficult otherwise;
- no cost-benefit analysis was required (even though beneficiaries made their own internal cost analyses);
- in the first call, projects that had already started or were initiated before the calls could still receive EU funding; in the second and third calls, projects could start at the earliest on the proposal's submission date (i.e. after the calls were launched).

**47** However, according to all but one of the member states we visited, the environmental compliance file and/or climate proofing study added for the third call represent a complication – because they take a long time, slowing down projects – and should be simplified. Three of the seven member states we visited questioned whether such files/studies were even appropriate for military mobility, given the urgency of their needs with a war ongoing in Europe.

**48** Most of the member states we consulted considered the 50 % EU co-financing rate fair. The potential applicants for general CEF transport calls are often the same as those for the military mobility calls. Indeed, according to the feedback we received, EU CEF transport projects are also often located on both the core TEN-T network and the military mobility network and meet dual-use requirements, as required for CEF military mobility calls (see [Table 1](#) above). This is the case, for example, for highway projects. Furthermore,

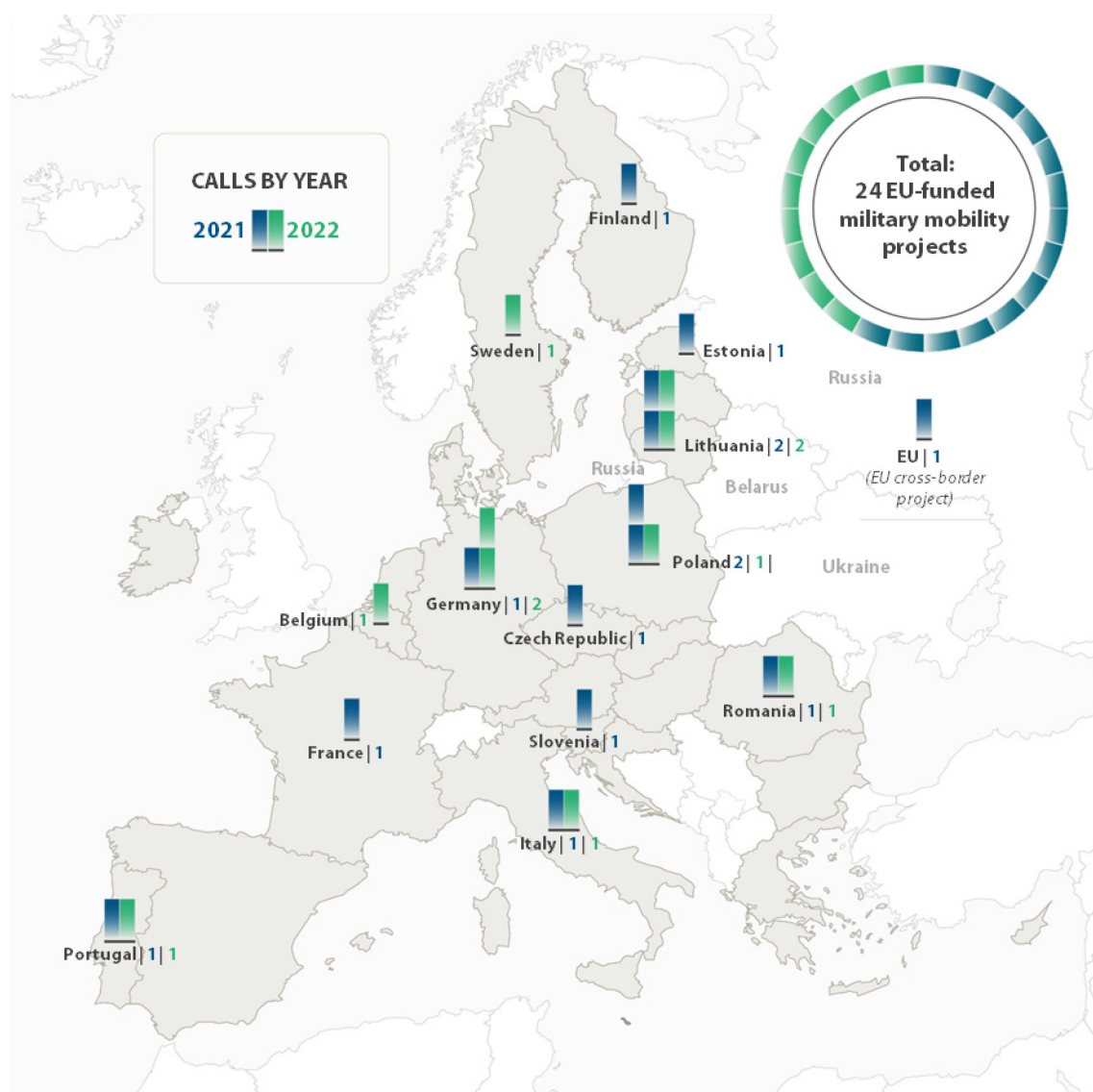


particularly in member states eligible for [cohesion funding](#), where other funds are offering co-financing rates of up to 85 %, a rate of 50 % is less attractive.

### Project maturity was an essential criterion in the selection process

**49** We sampled 24 projects selected for EU funding under the 2021 and 2022 military mobility calls for detailed analysis. We visited five of these projects on the spot in Germany, Estonia, Lithuania, Poland and Portugal (see [Figure 8](#) for further details on this sample).

**Figure 8 – Overview of our sample**



Source: ECA.

**50** Out of these 24 projects, only one started after the call results had been published and the grant agreement signed. This means the other 23 projects all started at various stages before the grant agreement signature, and four had even started before the call itself was published.

**51** For the start of the 2021-2027 period, the CEF transport work programme<sup>11</sup> exceptionally provided the possibility of funding projects that had already started (see paragraph 46). For example, according to the 2021 military mobility call for proposals, published on 16 September 2021, costs for dual-use infrastructure projects were eligible from 1 January 2021. According to the Commission, this derogation was to compensate for the gap between the 2014-2020 and 2021-2027 programmes resulting from the delayed adoption of the new CEF Regulation<sup>12</sup>. One reason this was possible was that the dual-use infrastructure requirements published on 10 August 2021 (see paragraph 09) were in many instances the same as those specified for other TEN-T projects by the TEN-T Regulation applicable at that time<sup>13</sup>. The maturity of the projects was therefore a decisive factor in their selection for EU co-financing.

**Military assessment and geostrategic dimension not sufficiently taken into account in selection of dual-use infrastructure projects**

**52** Table 2 shows the key steps of the evaluation process for dual-use infrastructure project applications.

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<sup>11</sup> See paragraph 08.

<sup>12</sup> See also Article 4(6) of Regulation (EU) 2021/1153 establishing the Connecting Europe Facility.

<sup>13</sup> Regulation (EU) No 1315/2013.

**Table 2 – Key steps of dual use infrastructure applications evaluation process**

Successive key steps	Resulting document
<b>First phase of the evaluation process (led by CINEA)</b>	
1. Evaluation by three independent transport experts.	Independent evaluation report
2. Consensus evaluation by the three independent experts resulting from a meeting led by CINEA moderators.	Consensus report
<b>Second phase of the evaluation process (led by DG MOVE)</b>	
3. EUMS military assessment.	<ul style="list-style-type: none"> <li>— E-mail for the 2021 call</li> <li>— EUMS evaluation form for subsequent calls</li> </ul>
4. Internal evaluation panel chaired by DG MOVE with members from DG MOVE, DG ENV, DG REGIO and CINEA to review all eligible proposals under call.	<p>Note: Prior to the internal evaluation panel meeting, DG MOVE made a proposal to take into account EUMS assessments for the “priority and urgency” criterion. The scores for this criterion were updated accordingly, when necessary.</p> <p>The updated scores and the justifications were included in the evaluation summary reports.</p>
5. Final selection committee meeting chaired by DG MOVE with members from DG MOVE, DG ENV, DG REGIO and CINEA at directors’ level.	Final evaluation summary reports and list of proposals selected for EU funding.

In addition, an external independent observer was engaged to oversee the evaluation process for the 2021 and 2022 calls and produce a final report.

**53** Under the calls, projects were selected on the basis of five criteria with equal weighting (priority and urgency, maturity, quality, impact, catalytic effect). For four of the seven member states we visited, the five project selection criteria were either inadequate or only partially adequate to identify projects of key relevance to improving military mobility in the EU. In particular, the military assessment by the EUMS, which looked at whether the proposed projects would actually enhance strategic deployment or resolve infrastructure gaps and bottlenecks, only counted towards the assessment of one criterion - priority and urgency. On the other hand, project maturity was essential (see

paragraph 51). Consequently, according to two member states we visited, some of these dual-use projects will not sufficiently address military aspects.

**54** We found that the selection of dual-use infrastructure projects for EU funding lacked sufficient consideration of geopolitical aspects, as the funding was not targeted at the projects with the highest geostrategic values. Three of the six member states that expressed an opinion on the subject had a similar view. Projects were therefore selected in a piecemeal way, project by project, to improve some isolated parts of a corridor but not necessarily in the most strategic locations. All member states visited considered that the selection process for EU-funded dual-use infrastructure projects should include certain forms of prioritisation.

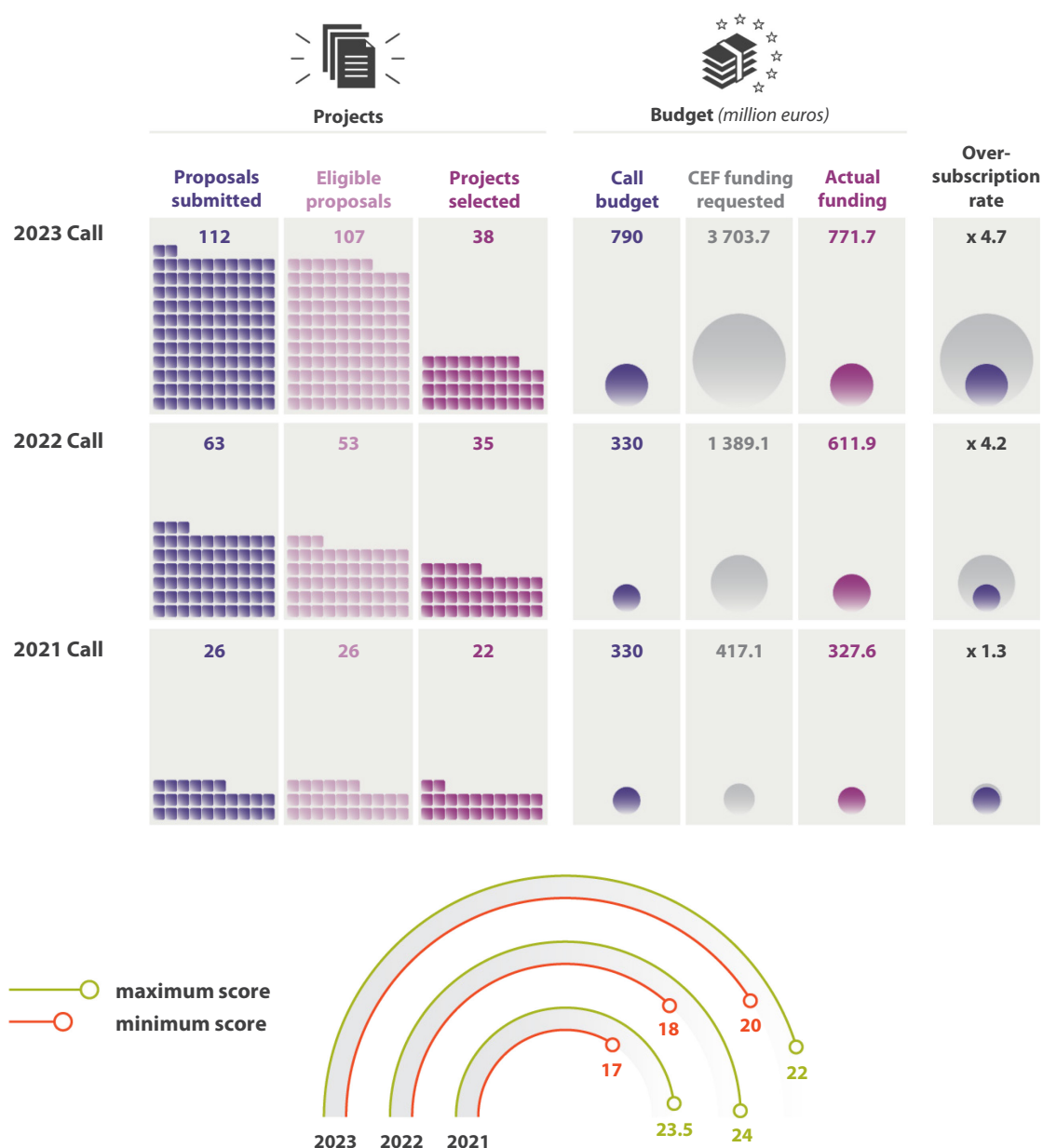
**55** In addition, under the 2021 call, the EUMS assessed two projects as “first priority” and 16 as “very important”. However, 22 projects were selected under the 2021 call. This means four projects were selected for EU funding even though the EUMS did not consider them “first priority” or “very important”. This may be explained by the fact that by the 2021 call was less oversubscribed.

**56** A particularly striking example occurred under the 2023 call, when a project to construct one of the last parts of one of the most strategic roads in the EU from a military perspective was not selected for EU funding even though the other three parts of the same road had been selected under the 2021 and 2022 calls. The assessment of the evaluation criteria for the different parts of this road was carried out by different experts and was not consistent. One way in which the 2023 call differed from the 2021 and 2022 calls was that it was more oversubscribed, meaning that several projects that passed the evaluation thresholds could not be selected due to the limited budget available. In its reply to letters from the member state in question, the Commission reminded it that “the project could also be eligible for funding under future general CEF Transport calls.”

#### **The EU funds attracted increased interest from one call to the next but with differing levels of uptake by member states**

**57** The number of applications with each CEF dual-use infrastructure call increased over time. This heightened competition meant that the minimum scores needed for selection also increased (see [Figure 9](#)). The slow start in 2021 can be explained by various factors such as the novelty of such calls or the time needed by different ministries (such as ministries of defence or transport) in certain member states to start cooperating on such issues. The increasing oversubscription of the calls demonstrates the increased interest among member states and project beneficiaries.

Figure 9 – CEF Military mobility calls application details



Source: ECA.

**58** Figure 10 shows that the 95 projects selected for EU funding were split between 21 different EU member states – all of those included in the figure, plus Bulgaria which is involved in a cross-border project. Such cross-border projects (labelled “EU” in Figure 10) account for only two of the 95 selected for funding:

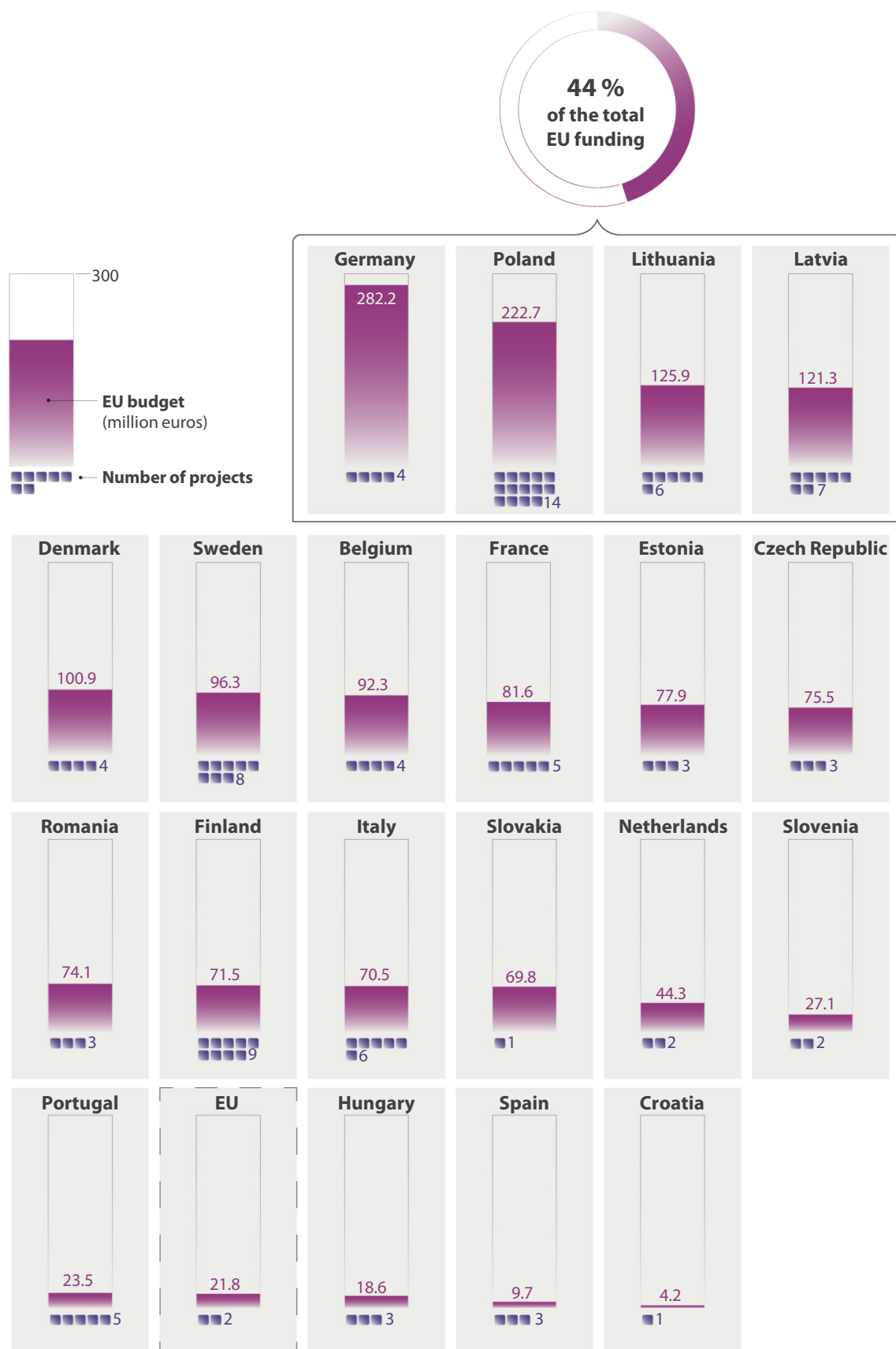
- (1) From the 2021 call: a railway project for a cross-border connection between Finland and Sweden.
- (2) From the 2023 call: the design phase of a new bridge over the Danube to connect Bulgaria and Romania.

**59** In terms of EU contribution, the top four member states, representing 44 % of the total, are:

- (1) Germany (16.5 % of the total EU contribution);
- (2) Poland (13.0 %);
- (3) Lithuania (7.4 %); and
- (4) Latvia (7.1 %).

There is a clear concentration of EU-funded projects in the east of the EU, with three of these top four member states bordering Russia, three bordering Belarus and one bordering Ukraine.

**Figure 10 – EU contribution and number of projects per member state (2021-2023 calls)**



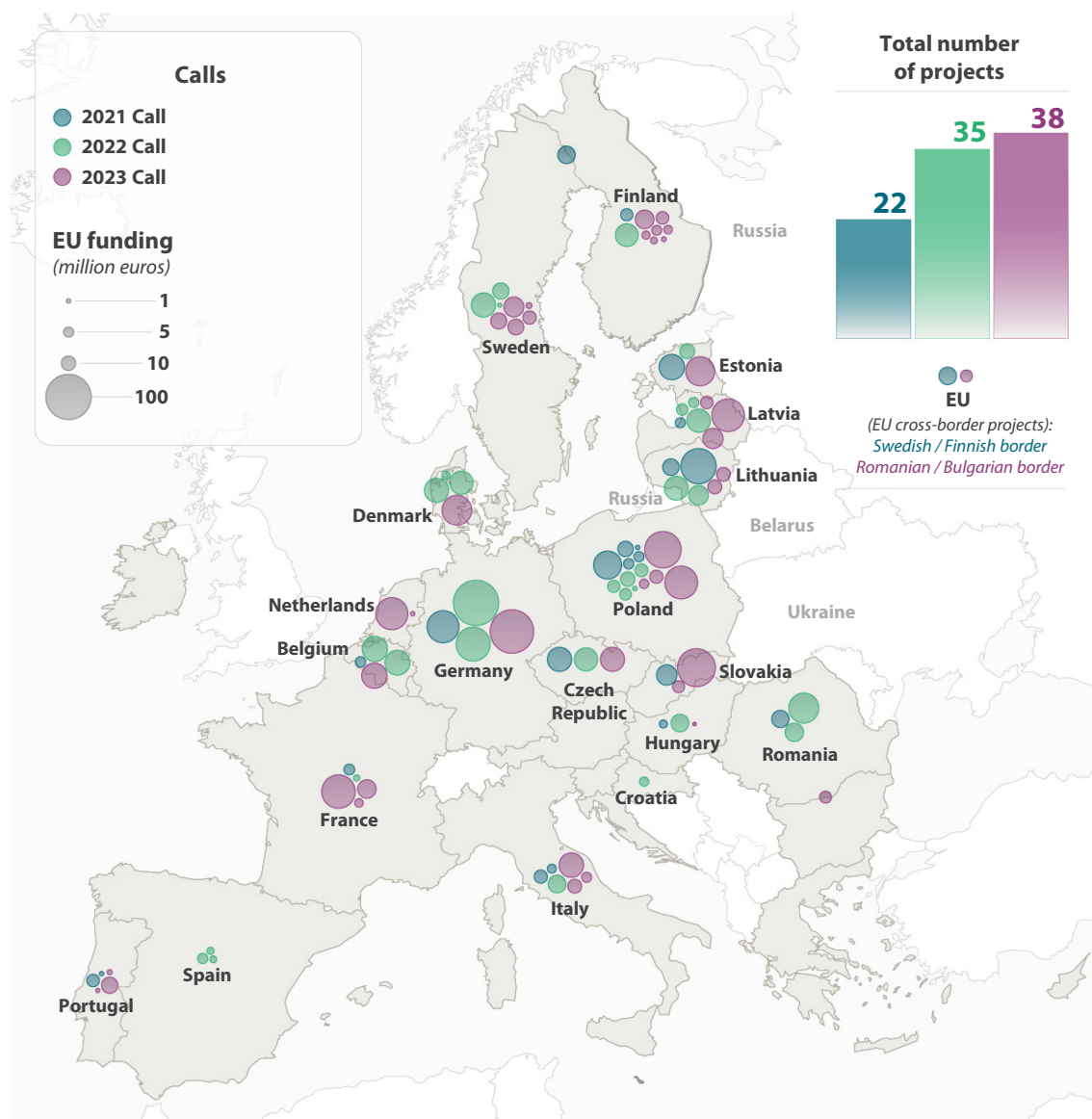
Source: ECA.

**60** On the other hand, on the southern route towards Ukraine, the EU did not fund any projects in Greece and made only a modest EU contribution to a Bulgarian consortium participant (see paragraph 58). Greece submitted two project applications for the 2023 call, which received scores above the required thresholds but were not selected due to lack of funding. This is another example illustrating that the weighting given to military criteria and geopolitical aspects in the project selection was insufficient (see paragraphs 53 and 54). The other member states with no EU-funded dual-use infrastructure are Austria, Cyprus, Ireland, Luxembourg, and Malta.

**61** In addition, different member states directly bordering one another focused on different types of projects (rail, air, road, etc.), meaning consistency between member states was lacking. Overall, 70 % of EU funding went to rail and road projects. *Figure 11* gives an overview of the member states where CEF military mobility projects were located and how much EU funding they received.



**Figure 11 – Overview of EU-funded military mobility projects under CEF**



Source: ECA.

**62** Figure 12 shows an analysis of the non-funded projects for the three calls. For the 2023 call, the main reason for rejecting applications was lack of funding, whereas for the 2022 call the low scores were the main reason. For the 2021 call, only four applications were rejected for lack of funding.

**Figure 12 – Project applications not selected for funding, by reason (2021-2023 calls)**



Source: ECA.

**63** CINEA, together with DG MOVE and the EUMS, have held information days each year (2021, 2022 and 2023) for CEF transport military mobility calls in order to help potential applicants<sup>14</sup>. We visited five projects from the 2021 call on the spot in five member states (see *Annex III*). The project coordinators all gave positive feedback on the assistance they had received, mainly from CINEA but also from DG MOVE. However, three of the seven member states also considered the application process is complex, including the electronic grant management system (eGrants), which they described as not very user-friendly.

**64** Following project selection, CINEA was responsible for preparing individual grant agreements with each project beneficiary. Project coordinators in the member states manage the projects and report continuously on their progress. Dedicated CINEA project

<sup>14</sup> See, for instance, [2023 CEF Transport Military Mobility Info Day](#).

officers are assigned to projects. At the time of our visits, all or parts of three of these five projects were delayed for various reasons.

## **Progress of actions under the four pillars is mixed**

### **Pillar I – “Multimodal corridors and logistical hubs”: solid progress on key actions at EU level and all invitations for member states to act implemented**

**65** Of the five key actions at EU level under the first pillar, three have already been completed (one with a delay) and two are ongoing (one with a delay). This represents solid progress overall for these actions (for further information, see [Annex IV](#)).

The seven member states we visited gave us feedback on the five invitations to act under the first pillar. The member states visited had generally implemented these actions. For further information, see [Annex V](#).

### **Pillar II – “Regulatory support measures”: some progress on key actions at EU level and mixed progress on invitations for member states to act**

**66** Among the seven member states we visited, there was consensus on the crucial importance of military mobility, particularly in the current European security context. They differed, however, in their top priorities depending on their national circumstances: for some the top priority was simplifying administrative procedures while for others it was dual-use infrastructure investments.

**67** Based on EDA’s feedback to the Commission, the four actions primarily addressed to EDA are ongoing. One of the two actions addressed to the Commission is completed and the other is ongoing. This represents satisfactory progress overall for these actions. For further information, see [Annex IV](#).

**68** The SDMMS project (see paragraph [11](#)) is being implemented in response to key action 3 at EU level under the pillar II. Its objective is to develop a unified software platform that ensures a secure environment for exchanging information on the movement of military units between countries, and for requesting and approving border crossing permits.

**69** The SDMMS project consortium includes 11 organisations from 10 member states. In addition to the consortium members, 11 member states are currently also participating in the project and are expected to contribute almost 20 % of the total project budget. Six of the seven member states we visited were positive regarding the development of this system, with ministries of defence looking forward to the potential of digitalisation. The one member state that was less interested explained this was because there were

currently no plans to digitalise the [EU customs form 302](#), as a change to the [Union Customs Code](#) would first be needed. In practice, the member states we visited, which are all NATO members, use [NATO form 302](#), which was introduced in the 1950s and on which EU form 302 is based, including for movements within the EU. The system prototype was expected to be delivered by the end of 2025, but the project is delayed.

**70** At the time of our meetings, the signature of the project’s memorandum of understanding by all participating member states was a major area of concern. Until the memorandum of understanding is signed, funds cannot be released by the EU after pre-financing or be received from participating member states that have not signed.

**71** The feedback we received from the member states visited on the three invitations to act under pillar II is mixed, particularly for action 1 – the most important action in terms of meeting the target of 5 days for border crossing procedures or 3 days in the case of rapid reaction units. Actions 2 and 3 can be considered completed. For further information, see [Annex V](#).

**Pillar III – “Resilience and preparedness dimension”: mixed progress on key actions at EU level, while invitations for member states to act cannot be clearly assessed**

**72** Pillar III of Action Plan 2.0 concerns the need “to be resilient, including in the context of cyber, climate change and other hybrid threats that may target critical nodes in the transport system used by the military”. This pillar is the one with the highest number of key actions at EU level, 14 out of 29 (48 %), while including only one invitation for member states to act. We found that Action Plan 2.0 includes far too many actions, particularly under this pillar, and should be more focused. Experts we consulted expressed the same view.

**73** [Annex IV](#) provides information on the progress of the 14 key actions at EU level under pillar III. Six out of 14 actions at EU level are primarily addressed to EDA, which we cannot audit. According to the [November 2023 Action Plan 2.0 progress report](#), five of these six actions are ongoing. The progress report did not include any information on the work ongoing for Action 10 on “reliable and effective exchange sharing of digital data between relevant civil and military aviation stakeholders.”. According to information received from EDA, this action is carried out by EDA through the [Single European Sky Air Traffic Management Research Deployment](#) programme. A dedicated EDF project is ongoing, addressing air traffic management data exchange, among other aspects. We found no evidence of any formal analysis of lessons learned from military exercises that would confirm the existence of a robust and effective lessons learned capability at EU level. Such a capability is crucial in order to ensure that issues arising from national, and multinational (including NATO) table-top and field exercises are properly recorded and addressed via a formal process, in order to recommend remedial actions.

**74** In terms of the progress made by the EU institutions on the key actions at EU level for pillar III, according to the information available and our further collection and analysis of information:

- for four there is no specific information on any progress;
- four are ongoing.

**75** One invitation for member states to act seeks to ensure “the cyber-resilience of the future digital processes and procedures, building on EDA’s work and exploring the possibility of developing functional requirements related to security”. All member states we visited recognised the importance of such threats and are working on cyber-resilience. However, the action is defined in a way that does not enable us to clearly assess its completion as it lacks clear criteria, a baseline, milestones as well as a specific target.








#### **Pillar IV – “The partnership dimension”: some progress for key actions at EU level**

**76** Pillar IV of Action Plan 2.0 includes four key actions at EU level and no invitations for member states to act. All seven member states we visited are also NATO members. For them, NATO is the main driver of collective defence in Europe. All member states visited confirmed the relevance of the actions under this pillar, particularly in terms of greater cooperation between the EU and NATO. However, they consider that the EU should not duplicate what NATO already does. They recognise the reality of NATO’s high-level classification of information but consider that it should not prevent the EU and NATO from cooperating further and regard military mobility as a good example of EU/NATO cooperation. All four key actions at EU level under this pillar are ongoing. However, one of the actions is formulated in a way that does not allow us to assess the progress made. For further information, see [Annex IV](#).

**77** Our assessment of the progress made on key actions at EU level and member states’ invitations to act is summarised in [Table 3](#) and [Table 4](#). The tables use a “traffic lights” colour, with the following meaning:








- green: completed or nearing completion;
- orange: ongoing;
- red: progress issues (e.g. only limited progress made, no information available, or not possible to assess completion).

**Table 3 – Key actions at EU level – ECA progress assessment summary**

					Total
	Pillar I – Multimodal corridors and logistical hubs: investing in dual-use transport infrastructure	3	2	-	5
	Pillar II – Regulatory support measures	1	5	-	6
	Pillar III – Resilience and preparedness	-	9	5	14
	Pillar IV – Partnership dimension	-	4	-	4
Total		4	20	5	29

Source: ECA.

**Table 4 – Invitations for member states to act – ECA progress assessment summary for the seven member states visited**

					Total
	Pillar I – Multimodal corridors and logistical hubs: investing in dual-use transport infrastructure	5	-	-	5
	Pillar II – Regulatory support measures	2	-	1	3
	Pillar III – Resilience and preparedness	-	-	1	1
	Pillar IV – Partnership dimension	-	-	-	-
Total		7	0	2	9

Source: ECA.

## Conclusions and recommendations

**78** EU policy on military mobility has developed since the first steps were taken in 2017. This audit examined the progress made, specifically looking at the second EU action plan on military mobility (Action Plan 2.0), published in November 2022. The plan was developed taking into account stakeholder contributions but under time pressure in the challenging context of Russia's war of aggression against Ukraine. Overall, we conclude that Action Plan 2.0 was not built on sufficiently solid foundations, due to some design weaknesses, such as a lack of both an in-depth *ex ante* analysis and a needs assessment allowing the evaluation of a commensurate budget. Progress towards its objectives – ensuring swift and seamless movement of military personnel, materiel and assets, including at short notice and on a large scale within and beyond the EU – has so far been variable.

**79** We found that there is no central function or body in the EU that coordinates military mobility measures. Representatives from five member states we visited referred to the governance arrangements for military mobility in the EU and indicated that they were complex and that it was difficult to find out who did what. In the area of regulatory measures, we identified overlaps (for example, simultaneous reporting lines and, similar project scopes) between what the different stakeholders do in relation to military mobility in the EU. The European Parliament has partial oversight of military mobility in the EU (see paragraphs [22-31](#)).

### Recommendation 1 – Improve the governance arrangements for military mobility in the EU

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The Commission and the European External Action Service (EEAS) should:

- (a) streamline coordination between the EU, member states and other stakeholders, for instance by appointing a single point of contact as appropriate;
- (b) enhance existing synergies and interaction between the European Defence Agency, Permanent Structured Cooperation projects and the Commission and the EEAS to minimise the risk of overlaps.

**Target implementation date: 2025**

**80** The wording of Action Plan 2.0 was the result of a compromise, which, while ensuring common agreement, may have diluted its overall effectiveness by accommodating the diverse positions of 27 member states. The design of the Action Plan 2.0, which covers the 2022-2026 period, resulted in limitations regarding monitoring



and reporting. The plan states that EU-level actors, including the European Defence Agency, “will” undertake the actions addressed to them, but merely “invites” the member states to undertake the actions addressed to them. Member states have no obligation, nor were they asked by the Commission or the EEAS, to specifically report to the EU via a formalised process on the actions they are “invited” to take, and therefore do not do so (see paragraphs 33-37 and 40).

**81** Three of the seven member states we visited consider Action Plan 2.0 a political document communicating that the EU is active in the area of military mobility. It is hampered, however by not being sufficiently operational. For instance, only 13 of 29 key actions at EU level have target dates (see paragraphs 38-39).

**82** The first progress report for Action Plan 2.0 was published in November 2023. It does not systematically include information on the progress made to date on each individual key action at EU level. Therefore, rather than providing a clear reference to the progress on actions set out in the action plan, the report is more of a list of what has happened in terms of military mobility in the EU in the past year of the reporting period. It also does not include an analysis of lessons learned so far, for instance from multinational military exercises (see paragraphs 40-41 and 73).

## Recommendation 2 – Monitor and report on the progress of each action included in Action Plan 2.0

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The Commission and the EEAS should closely monitor the implementation of Action Plan 2.0 by systematically assessing progress, delays and potential issues in relation to each key action at EU level. Without prejudice to member states’ sovereignty in military mobility, the Commission and the EEAS should encourage the member states to provide the information on the progress of actions envisaged for them. The information on the fulfilment of each action should then be included in subsequent progress reports.

**Target implementation date: 2025**

**83** The amount of EU funding made available plays a key role in determining how much leverage the EU can expect to have in influencing military mobility policy choices. The stakeholders we interviewed all regarded the 2021-2027 multiannual financial framework’s (MFF) budget of €1.69 billion under the Connecting Europe Facility (CEF) for military mobility dual-use infrastructure as modest, but they also generally welcomed it as a first step in the right direction. We found that, at the time Action Plan 2.0 was published, the Commission had not made a robust estimate of the overall funding required to make its objectives and targets achievable (see paragraphs 35 and 43).

**84** To take into account developments in the security situation in Europe following the start of Russia's war of aggression against Ukraine, the Commission front-loaded the available amounts into the 2022 and 2023 calls under CEF. Six of the seven member states we consulted considered this to be the right approach to take, as EU-funded projects could then potentially be completed earlier. While making this budget available quickly for investments in dual-use infrastructure sent an important political signal from the EU, we found that it led to a lack of stability and predictability in the EU funding provided, as there will be a gap of more than 4 years until the next MFF – and therefore a significant interval before any new calls and funding for dual-use infrastructure. This risks contributing to delays in potential additional important investments and a loss of experience among stakeholders in relation to EU funding and tenders (see paragraph 45).

**85** Despite the level of oversubscription for the second and third calls, and the unprecedented level of threats at the EU's borders, which are more tangible than ever, no more EU funds are available under the current MFF for military mobility calls to finance dual-use infrastructure projects (see [Figure 9](#) and paragraph 48).

**86** The potential applicants for general Connecting Europe Facility (CEF) transport calls are often the same as those for the military mobility calls. Indeed, we found that projects supported under CEF transport calls are often located on both the core trans-European transport (TEN-T) network and the military mobility network and meet dual-use requirements, as per the criteria for CEF military mobility calls. There is therefore potential to use CEF transport calls to solve military mobility bottlenecks (see paragraph 48).

### **Recommendation 3 – Assess the possibility of using CEF transport calls to finance dual-use infrastructure projects under the current MFF (2021-2027)**

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The Commission should assess the possibility of using the remaining CEF transport calls under the current MFF to finance dual-use infrastructure projects. This assessment should take into account military requirements and the gaps identified by the EU in its military network.

**Target implementation date: 2025**

## Recommendation 4 – Take steps to improve the predictability of possible funding for military mobility under the post-2027 MFF

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When preparing the next MFF proposal, the Commission should examine how possible funding for dual-use infrastructure can be made more predictable. The proposal should include an assessment of whether relevant EU instruments can be used to finance dual-use infrastructure projects.

**Target implementation date: 2027**

**87** We found that the five project selection criteria for the CEF military mobility calls with equal weighting were only partially adequate to identify projects of key relevance to improving military mobility in the EU. This assessment was confirmed by four of the seven member states we visited. In particular, the military assessment only counted towards the assessment of one criterion, priority and urgency. There is therefore a risk of some of these dual-use projects not being the most relevant from a military perspective (see paragraphs [44](#) and [53](#)).

**88** We also identified that the selection of dual-use infrastructure projects for EU funding lacked sufficient consideration of geopolitical aspects. Three of the six member states that expressed an opinion on the subject agreed. Projects were selected in a piecemeal way, project by project, to improve some isolated parts of a corridor but not necessarily in the most strategic locations, and without considering the broader picture. All member states visited considered that the selection process for EU-funded dual-use infrastructure projects should include certain forms of prioritisation (see paragraphs [54](#) and [56](#)).

**89** The 95 projects selected for EU funding were split among 21 different EU member states. There is a clear concentration of EU-funded projects in the central and eastern part of the EU, with three of the top four member states bordering Russia, three bordering Belarus and one bordering Ukraine. On the other hand, on the southern route towards Ukraine, for instance, the EU did not fund any projects in Greece and made only a modest contribution to a Bulgarian consortium participant (see paragraphs [58-60](#)).

## Recommendation 5 – Improve the selection process for dual-use infrastructure projects under the post-2027 MFF

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Under the post-2027 MFF, the Commission and the EEAS should ensure that the most relevant dual-use infrastructure projects are selected by prioritising investments that address gaps identified by the EU in its military network, thereby promoting efficiency and effectiveness. This should include looking for synergies with NATO corridors. To this end, the Commission could consider increasing the weighting of the military assessment in the selection process to reflect the principle that dual-use projects should benefit both civilian and military users fairly.

**Target implementation date: 2027**

**90** We found that Action Plan 2.0 included far too many actions and was not sufficiently focused. This was particularly the case for the pillar III “Resilience and preparedness”, the one with the highest number of key actions at EU level (14 out of 29 or 48 %). Several stakeholders had the same concern (see paragraph 72).

**91** Overall, we found that four of the 29 key actions at EU level can be considered completed, while the majority remained ongoing. For five out of 29 actions there was insufficient information to assess the current state of implementation. A further eight key actions were under the responsibility of EDA, which we do not have the power to audit, meaning we were unable to verify their implementation status. Overall, pillar I of Action Plan 2.0, covering investments in dual-use transport infrastructure, saw the most progress, while work on the other three pillars was largely ongoing (see paragraphs 65-77).

**92** The seven member states we visited responded to the invitation, under the pillar I, to undertake dual-use transport infrastructure investments. While they have actively contributed to the work on the regulatory support measures under pillar II, not all of them have met the target of 5 working days for border crossing procedures (3 days for rapid reaction units). Because of the lack of indicators and specific targets, including target dates, to be achieved for all actions, we cannot give a precise overall assessment of the progress made on Action Plan 2.0, beyond indicating that implementation of actions is ongoing and progress has been variable (see paragraphs 65-77).

## Recommendation 6 – Make the design of the EU’s military mobility actions more focused

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When designing future military mobility action plans, the Commission and the EEAS should:

- (a) systematically exploit the lessons learned from the current action plan, from national and multinational (including NATO) exercises, and from Russia’s war of aggression against Ukraine. These lessons learned should also be disseminated to all relevant stakeholders;
- (b) focus actions on improving infrastructure as well as clear actions enabling faster cross-border movements and enhancing cyber-security and set indicators, targets and target dates, where possible, to encourage reporting on progress for all actions.

**Target implementation date: 2026, the last year of the current action plan**

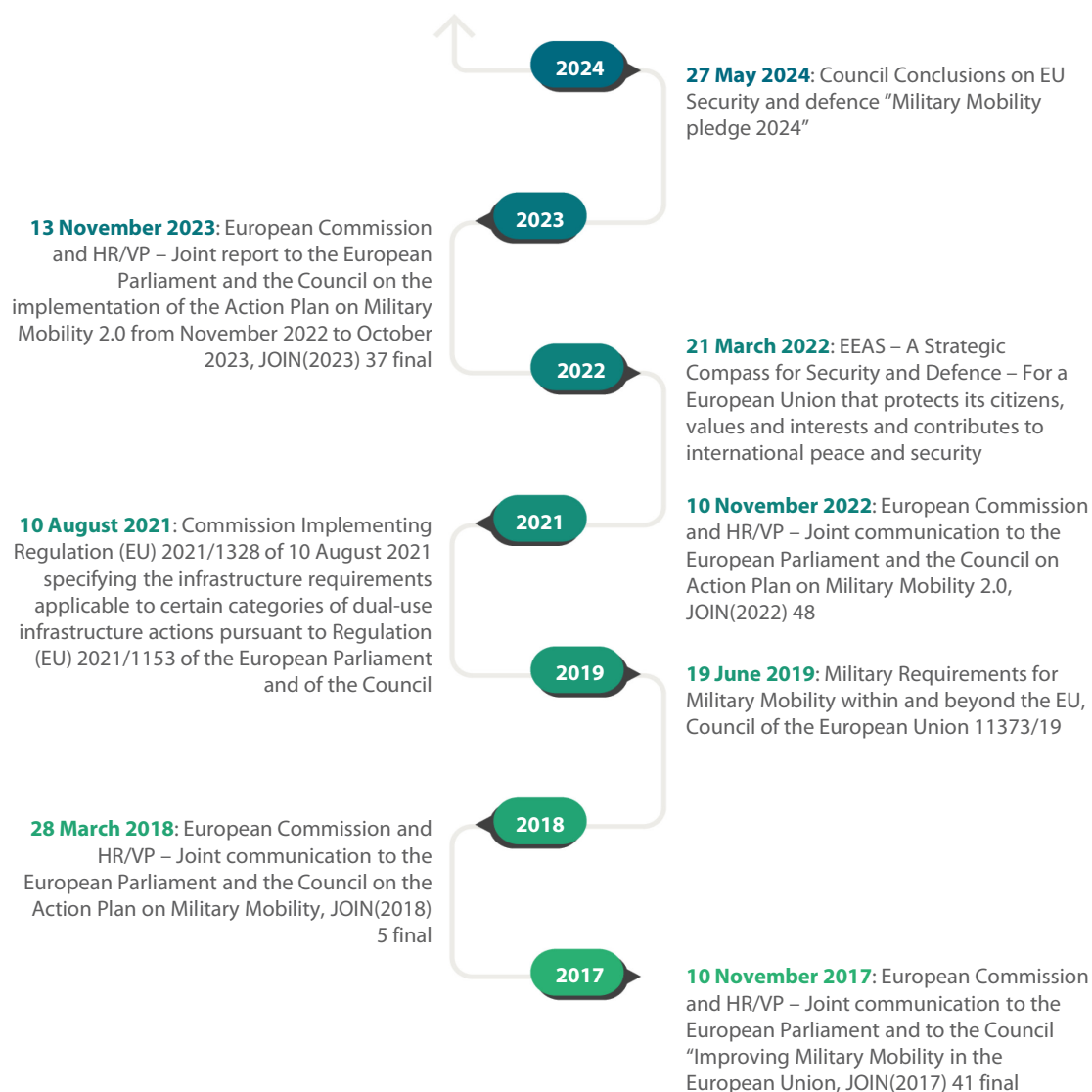
This report was adopted by Chamber III, headed by Ms Bettina Jakobsen, Member of the Court of Auditors, in Luxembourg at its meeting of 3 December 2024.

*For the Court of Auditors*

Tony Murphy  
*President*

# Annexes

## Annex I – Timeline of the military mobility developments in the EU, 2017-2024



Source: ECA.

## Annex II – Roles and responsibilities of all stakeholders of military mobility in the EU

### EU MEMBER STATES

There is [increasing cooperation in the EU on security and defence](#), and the [2021-2027 multiannual financial framework \(MFF\)](#) provides significantly more funding for defence than previous MFFs. For example, it introduces funds for dual-use military mobility infrastructure and for the [European Defence Fund \(EDF\)](#). The latter has a budget of €8 billion for 2021-2027, with an additional €1.5 billion under the new Strategic Technologies for Europe Platform (STEP) instrument with the [2021-2027 MFF mid-term revision](#). However, these EU funds only represent a small fraction of defence expenditure by EU member states. EU member states consider defence a matter of national sovereignty. According to EDA's "[Defence Data 2022 – Key findings and analysis](#)" document, "in 2022, total defence expenditure of the 27 Member States amounted to €240 billion, continuing the positive trend of eight consecutive years of growth".

Similarly, national budgets of EU member states include funds for military mobility projects and infrastructure for dual-use purposes. No data is available on the amounts involved.

EU member states ministries usually have internal audit departments. External audits are carried out by those countries' supreme audit institutions (SAIs). SAIs (as well as the ECA) are members of the International Organization of Supreme Audit Institutions ([INTOSAI](#)), which developed the International Standards of Supreme Audit Institutions ([ISSAIs](#)). The ISSAIs are the authoritative international standards on public-sector auditing.

### NORTH ATLANTIC TREATY ORGANIZATION

The North Atlantic Treaty Organization ([NATO](#)) is a political and military alliance committed to the principle of collective territorial defence. As of 7 March 2024, NATO has [32 member countries from Europe and North America](#). Out of these 32, 23 are EU member states. Four EU member states are not NATO member countries (Austria, Cyprus, Ireland and Malta). The US and Germany are the [top contributors to NATO's budget](#). The US is the NATO member country with by far the highest number of active-duty military personnel ([approximately 1.3 million](#)).

NATO is the key reference/cornerstone for NATO member countries' ministries of defence in terms of military mobility as well as the key driver for military mobility in Europe (for instance, through its operational plans, military requirements and standards for military mobility, or NATO customs form 302).

The [NATO 2024-2028 Common Funding Resource Plan](#) includes the NATO Security Investment Programme (NSIP). The NSIP funds common investment necessary to enhance and update NATO's assets, including military infrastructure in NATO member countries. The third [Joint Declaration on EU-NATO Cooperation of 10 January 2023](#) refers to achieving tangible results in military mobility.

NATO has an internal audit structure. The International Board of Auditors for NATO (IBAN) is the independent, external audit body for NATO. IBAN conducts three types of audits: financial audits of NATO bodies and reporting entities, performance audits of NATO, and financial audits of the NATO NSIP.

### EUROPEAN DEFENCE AGENCY

The European Defence Agency (EDA) was established in 2004. Its mission was “to support the Member States and the Council in their effort to improve European defence capabilities in the field of crisis management and to sustain the European security and defence policy as it stands now and develops in the future”. According to its 2024 long-term review, the Agency articulates the member states’ defence interests in the EU context, acting as “a true intergovernmental defence nexus at EU level”.

EDA organises events on military mobility, such as high-level symposia and has several military mobility initiatives, including:

- The “Project Team Movement and Transport” aimed as an expert-level platform where Member States exchange information and discuss ongoing activities related to military movement and transport with the aim to benefit from them while avoiding duplication. All 27 EU member states participate in the project team, as well as Norway and Switzerland. Partners include the Commission, EEAS/EUMS, NATO, the Movement Coordination Centre Europe, the Athens Multinational Sealift Coordination Center and the European Air Transport Command.
- The “Optimising cross-border movement permission procedures in Europe” programme, established to harmonize and simplify cross border movement procedures, addressing both regulatory and procedural issues.
- The “Harmonising military requirements related to Customs” programme, which was developed to address customs related activities for the military.

EDA has an internal auditing function. Its external audit is performed by a “College of Auditors” composed of three auditors from three different participating members states. The operational rules of EDA indicate that “The Agency shall operate under the authority and the political supervision of the Council, to which it shall provide regular reports and from which it shall receive regular guidelines.”

### EUROPEAN INVESTMENT BANK

The European Investment Bank (EIB) is the world’s largest multilateral borrower and lender. In June 2023, the EIB’s Board of Directors decided to increase its financing for security and defence up to €8 billion through its Strategic European Security Initiative. It aims to mobilise investment in support of Europe’s dual-use security and defence systems. Military mobility is one of the eligible activities.

In May 2024, the EIB updated its definition of dual-use goods and infrastructure eligible for EIB Group financing and agreed to facilitate financing for small and medium-sized enterprises and innovative start-ups in the security and defence industry.



The tripartite agreement between the European Commission, the ECA and the EIB covers “both the financing operations under the mandates conferred by the European Union on the Bank and the operations managed by the Bank and guaranteed by the general budget of the European Union”. Military mobility financed by the EIB does not fit into this framework.

The EIB has an internal audit department. Its Inspectorate General comprises three independent control and accountability functions: evaluation, investigation, and complaints mechanism. Its Audit Committee is reporting to the Board of Governors<sup>15</sup>. The EIB’s external auditor (a private audit firm) reports directly to the Audit Committee and produces an audit opinion on the EIB’s financial statements<sup>16</sup>.

### THE COMMISSION, EUROPEAN EXTERNAL ACTION SERVICE AND EU AGENCIES

For the Action Plan on Military Mobility 2.0, the key parties involved are:

- DG MOVE, which works at improving long-term infrastructure planning to improve capacity. The three CEF military mobility calls for proposals in 2021, 2022 and 2023 were by DG MOVE.
- The European Climate, Infrastructure and Environment Executive Agency (CINEA), to which the Commission has delegated the management of the Connecting Europe Facility (CEF) Transport. CINEA is responsible for the overall management of CEF military mobility calls and all other CEF calls.
- DG DEFIS, which co-drafted the November 2022 Action Plan on Military Mobility 2.0. and manages the military mobility projects selected from the EDF calls, including the Secure Digital Military Mobility System (SDMMS).
- The Strategy, Coordination and Policy department of the EEAS, which was co-lead with DG MOVE and DG DEFIS for the development of Action Plan 2.0, as well as for preparing the first progress report for that action plan. The European Union Military Staff (EUMS), which is part of the EEAS, provides expertise and strategic advice on military subjects, including military mobility. For the three military mobility calls, the EUMS assessed the two military criteria<sup>17</sup>.
- The Directorate-General Taxation and Customs Union (DG TAXUD) was involved in the development of the customs document for cross-border movements of military goods in the context of military activities (EU customs form 302) and the resulting amendment of the Union Customs Code. It also worked with EDA to prepare guidance on form 302 from a more practical point of view. So far, DG TAXUD’s involvement in Action Plan 2.0 has been limited to offering advisory support for the potential future digitalisation of EU form 302.

<sup>15</sup> See the EIB’s Audit Committee Annual Reports for the year 2022.

<sup>16</sup> See the EIB Financial Report 2022.

<sup>17</sup> Criterion 1: to what extent does the proposed project contribute to enhanced strategic deployment of military forces in the EU for missions, operations, and routine activities?; criteria 2: to what extent does the project eliminate identified gaps in the member state's infrastructure network, including bottlenecks currently undermining military movements?

- The Directorate-General Communications Networks and Content and Technology ([DG CNECT](#)) has conducted two risk assessments for the energy and telecommunication sectors. There is currently no timeline for the next risk evaluation and risk scenarios from a cybersecurity perspective. Action Plan 2.0 provides an incentive to examine the transport sector next.
- The Commission Secretariat-General's role is to ensure high-level coordination between Commission directorates and services. It represents the Commission within different fora, such as the Politico-Military Group ([PMG](#)) and the Political and Security Committee ([PSC](#)) at the Council of European Union as well as the European Union Military Committee ([EUMC](#)) at the EEAS. It chairs the regular meetings between Commission directorates-general and NATO.
- Other DGs: [DG SANTE](#)<sup>18</sup>, [DG ENER](#)<sup>19</sup>, [DG ECHO](#)<sup>20</sup> and [DG NEAR](#)<sup>21</sup>.
- The European Union Aviation Safety Agency ([EASA](#))<sup>22</sup>.

The Commission, EEAS and EU agencies have internal audit departments (e.g. the Commission's [Internal Audit Service](#)). The ECA is the EU's external auditor. Our annual reports and special reports serve as the basis for Parliament's annual discharge exercise. We carry out all types of audits – financial, compliance and performance.

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<sup>18</sup> For the sixth key action at EU level for pillar III, "Resilience and preparedness".

<sup>19</sup> For the 12<sup>th</sup> key action at EU level for pillar III.

<sup>20</sup> For the 14<sup>th</sup> Key action at EU level for pillar III.

<sup>21</sup> For the fourth key action at EU level for pillar IV, the "Partnership dimension".

<sup>22</sup> For the 13<sup>th</sup> key action at EU level for pillar III.

### Annex III – Projects visited on the spot

Member state	Project objective	EU co-financing (in million euros)
Estonia	A diversified project aimed at enhancing multimodal military mobility in Estonia and improving dual-use transport links to an army base with the construction of a new harbour quay, the reconstruction of a motorway viaduct and the reconstruction of part of a railway line	<b>31.2</b>
Germany	A rail project to improve the infrastructure for 740-metre trains on the North Sea-Baltic corridor with the construction of a bundle of railway bridges and sidings	<b>49.6</b>
Lithuania	The development of a road section to the Lithuanian-Polish border	<b>48.7</b>
Poland	A project to increase the operational capabilities of an airport's air side for military operations	<b>37.9</b>
Portugal	A project for a dual-use intermodal terminal and rail extensions in a port	<b>7.6</b>
<b>TOTAL</b>		<b>175.0</b>

## Annex IV – Progress on key actions of Action Plan 2.0 at EU level – Additional information




Traffic lights colour code: green: completed or nearing completion, orange: ongoing, red: progress issues.<sup>23</sup>

Key action at EU level	Progress	ECA assessment	Traffic light
<b>PILLAR I – Multimodal corridors and logistical hubs</b>			
ACTION 1: <i>“By the end of 2022, the EEAS (including EUMS) in coordination with Member States, Commission services and EDA, will update the Military Requirements within and beyond the EU.”</i>	On 23 October 2023, the Council adopted the revised military requirements including Annex II “Multi-Modal Transport Corridors” and an annex on fuel supply chain infrastructure <sup>24</sup> .  Updating military requirements will be a recurring exercise for the EU as NATO reviews its military requirements on a regular basis.	Completed (with a delay)	
ACTION 2: <i>“EDA and Commission services will continue their cooperation in ensuring access to airspace and air navigation services for civil and military aviation...”</i>	We note that “continuing cooperation” cannot be considered a SMART objective as it is not specific, measurable or time-bound.	Ongoing <sup>25</sup>	

<sup>23</sup> For further information: see paragraph 77.


<sup>24</sup> See Joint report to the European Parliament and the Council on the implementation of the Action Plan on Military Mobility 2.0 from November 2022 to October 2023, JOIN(2023) 37 final (hereinafter: “joint report for November 2022 to October 2023”), paragraph 15.

<sup>25</sup> Joint report for November 2022 to October 2023, paragraph 20.



Key action at EU level	Progress	ECA assessment	Traffic light
ACTION 3: <i>“By mid-2023, Commission services together with the EEAS will carry out a study to identify possibilities for short-notice, large-scale movements to improve fuel resilience, long-term infrastructure planning and optimal use of this infrastructure. ... Based on input by national authorities, the Commission services and EEAS will analyse possible gaps and suggest actions to address them.”</i>	This action refers to the three-step analysis mentioned in paragraph 36. The gap analysis was being further enriched with input from member states in July 2024.	Ongoing (with a delay) <sup>26</sup>	
ACTION 4: <i>“By summer 2023, the EEAS, in consultation with Commission services and EDA, will liaise with a willing Member State to organise the first annual event on military mobility...”</i>	The “Expert meeting on Military Mobility – increasing commitments towards a connected Europe” took place in Sweden on 19 and 20 June 2023.	Done <sup>27</sup>	
ACTION 5: <i>“... the Commission will, within the overall review of priorities in the mid-term review of the MFF, consider strengthening the military mobility budget...”</i>	This was considered. However, <b>no budget for dual-use infrastructure projects was added as a result of the mid-term review of the MFF</b> . A group of member states, including some we visited, had been unsuccessfully lobbying for such an increase in military mobility funding.	Done	



<sup>26</sup> Joint report for November 2022 to October 2023, paragraph 17.

<sup>27</sup> Joint report for November 2022 to October 2023, paragraph 3.

Key action at EU level	Progress	ECA assessment	Traffic light
<b>PILLAR II – Regulatory support measures</b>			
<p><b>ACTION 1:</b> “By 2024, EDA will support participating Member States to fully implement the technical arrangements for cross-border movement permissions procedures for surface and air by monitoring their usage as well as by identifying and resolving bottlenecks and obstacles; identify fields not covered in the signed Technical Arrangements and improve their content; and develop a Technical Arrangement for the maritime domain.”</p> <p><b>ACTION 2:</b> “By the end of 2024, EDA will assess how to increase synergies between the work done by the <a href="#">PESCO project “Military Mobility”</a> and the <a href="#">PESCO project “Network of LogHubs in Europe and Support to Operations.”</a>”</p> <p><b>ACTION 5:</b> “By 2024, EDA will elaborate a concept for an EU-wide logistics IT network to enable the exchange of logistic data amongst various participants. By 2023, EDA will present the findings of a study on mapping of national and commercial logistics IT systems, including the Track &amp; Trace and Enterprise Resource Planning (ERP) software, which will serve as a basis for initiating further actions.”</p> <p><b>ACTION 6:</b> “By 2024, EDA will define a first package of common standards to promote military use of Additive Manufacturing solutions in an interoperable manner.”</p>	<p>According to the November 2023 progress report, on which EDA gave feedback to the Commission, these actions are ongoing<sup>28</sup>.</p> <p>In November 2024, EDA informed us that it has carried out action 2, that the final report for action 5 (Concept for an EU-wide logistics IT network) is available and has been shared with the participating member states, and that the project management plan for action 6 (Additive manufacturing for logistic support) has been drafted and the first results are available.</p> <p>Note: All member states we visited gave us positive feedback on these two PESCO projects, and particularly on the military mobility project, which involves 25 EU member states plus the US, Canada and Norway. Participating EU member states provide an annual implementation report for the PESCO military mobility project.</p>	<p>These four actions are primarily addressed to EDA meaning we cannot audit them (see paragraph <a href="#">20</a> and <a href="#">Annex II</a>).</p>	

<sup>28</sup> [Joint report for November 2022 to October 2023](#), paragraphs 21 and 22 for action 1, paragraph 23 for action 2, paragraph 27 for action 5 and paragraph 28 for action 6.





Key action at EU level	Progress	ECA assessment	Traffic light
ACTION 3: <i>“The Commission will identify topics under the European Defence Fund in future annual work programmes that will enhance Military Mobility...”</i>	In addition to the <a href="#">SDMMS project selected under the 2021 EDF call</a> , the <a href="#">FASETT</a> project was selected under the 2022 EDF call and <a href="#">the ESOCA</a> was selected under the 2023 EDF call.	Done so far	
ACTION 4: <i>“The Commission will monitor the development of the digital system for the secure and quick exchange of information on military mobility and, if needed, will prepare legal amendments to the EU Customs Legislation to ensure that there is a legal framework for the use of the System by the Member States and that the System is aligned with the customs procedures as established in the EU Customs Legislation.”</i>	For further information, see paragraph <a href="#">69</a> .	Ongoing	

Key action at EU level	Progress	ECA assessment	Traffic light
<b>PILLAR III – Resilience and preparedness</b>			
ACTION 1: <i>“EDA in close consultation with Member States, EEAS and Commission services, will follow-up on the CARD focus area Enhanced Military Mobility, to address the gaps and deficits with regard to the resilience as well as the logistical and lift capacity required for the movement of large-scale forces...”</i>	According to the November 2023 progress report, for which EDA gave feedback to the Commission, these actions are ongoing <sup>29</sup> .	These four actions are primarily addressed to EDA, meaning we cannot audit them (see paragraph 20 and Annex II).	
ACTION 3: <i>“By 2023, EDA will explore the adaption of civil outsized cargo assets for military purposes, taking into account the activities of the PESCO Project ‘Strategic Air Transport for Outsized Cargo (SATOC)’”</i>	In November 2024, EDA informed us that it is launching two studies, one for rail and another for inland waterways transport capacities (including infrastructural and regulatory aspects).		
ACTION 4: <i>“By 2024, EDA will identify possible requirements for specialised rail transport assets and strategic sealift capabilities.”</i>			
ACTION 7: <i>“By 2024, EDA, together with Commission services and EEAS (including EUMS), will assess the benefit of strategic lift capacities for dual use, such as disaster relief.”</i>			
ACTION 10: <i>“EDA and Commission services will continue their efforts to ensure reliable and effective exchange and sharing of digital data between relevant civil and military aviation stakeholders.”</i>	Need for digital data sharing highlighted in the November 2023 progress report but no information of actual work ongoing <sup>30</sup> .		

<sup>29</sup> Joint report for November 2022 to October 2023: paragraph 30 for actions 1 and 3, paragraph 31 for action 4 and paragraph 29 for action 7.



<sup>30</sup> Joint report for November 2022 to October 2023: paragraphs 32 and 35 for action 10.






Key action at EU level	Progress	ECA assessment	Traffic light
ACTION 12: <i>“EDA, together with EEAS and Commission services, will build on ongoing initiatives to enhance the climate resilience and energy security of military installations and transport capabilities that are necessary for military mobility, and put forward recommendations to Member States as part of the work on climate and defence....”</i>	According to the November 2023 progress report, for which EDA gave feedback to the Commission, this action is ongoing <sup>31</sup> .		
ACTION 2: <i>“By 2023, the EEAS will assess the logistical footprint for CSDP missions and operations, notably with regard to certifications and inspections, as well as identify possible gaps in the lift capacity and provide recommendations on collaborative opportunities.”</i>	No information in the November 2023 progress report.	No information obtained on this action when consulting stakeholders.	
ACTION 5: <i>“EEAS, EDA and Commission services will explore how to strengthen the coordination of movement capacity, including by seeking synergies with multi-national movement coordination centres.”</i>	According to the November 2023 progress report, this action is ongoing <sup>32</sup> .	No further information.	
ACTION 6: <i>“By the end of 2024, Commission services will provide an overview per transport mode of all key actors in the civilian domain for emergency and crisis planning and coordination purposes.”</i>	No information in the November 2023 progress report.	No information obtained on this action when consulting stakeholders. However, different stakeholders insisted on the importance of a “whole-of-society” approach for military mobility.	

<sup>31</sup> Joint report for November 2022 to October 2023: paragraph 34 for action 12.



<sup>32</sup> Joint report for November 2022 to October 2023: like for action 7, see paragraph 29 for action 5.

Key action at EU level	Progress	ECA assessment	Traffic light
ACTION 8: <i>“The EEAS, Commission and EDA will exploit multinational exercises to mainstream military mobility activities (deployment, sustainment and redeployment of the forces), including EU live exercises and Parallel and Coordinated Exercises with NATO, as well as through EU participation in NATO exercises, as appropriate.”</i>	No information in the November 2023 progress report.	The importance of military exercises was underlined by all stakeholders. The PESCO military mobility project has been conducting table-top exercises to test cross-border movement permissions (CBMP). The member states we consulted participated in different military exercises in 2024, such as <a href="#">Steadfast Defender 24</a> with NATO or <a href="#">Quadriga 24</a> . Four of the five dual-use project coordinators we met informed us that the EU-funded infrastructure will be tested in practice for military mobility. There is no evidence of a formalised analysis of lessons learned from military exercises.	
ACTION 9: <i>“The EEAS, together with Commission services and the EDA, will organise scenario-based exercises involving Member States’ experts.”</i>	No information in the November 2023 progress report.	The EUMS is the lead for the annual MILEX crisis management exercises. The last ones were <a href="#">MILEX 22</a> , <a href="#">MILEX 23</a> and <a href="#">MILEX 24</a> .	

Key action at EU level	Progress	ECA assessment	Traffic light
ACTION 11: <i>“The Commission services, the EEAS and the NIS cooperation group, in coordination with relevant civilian and military bodies and agencies and established networks, will conduct on a regular basis risk evaluation and risk scenarios from a cybersecurity perspective, focusing on priority critical sectors. ...”</i>	According to the November 2023 progress report, risk evaluation and risk scenarios have been conducted for the telecommunications and the electricity sectors <sup>33</sup> .	At our meeting, the Commission informed us there was not yet any planned date or scope for such a risk evaluation and risk scenario for the transport sector, which is crucial for military mobility. There are many more stakeholders for the transport sector than for the telecommunications and electricity sectors.	
ACTION 13: <i>“By the end of 2023, Commission services together with EASA, and in collaboration with the military aviation authorities and industry, will launch a pilot project establishing a mechanism of mutual recognition of parts used by civil and military configurations of aircraft models. ...”</i>	No information in the November 2023 progress report, including in paragraph 20 on “Access to airspace and airspace navigation services (SES and SESAR)”.	No further information.	
ACTION 14: <i>“Commission services, EDA and EEAS will explore a set of emergency measures that would provide the military with prioritised access to transport infrastructure, capabilities and routes, when necessary, in times of crisis recognised at EU level. ...”</i>	The November 2023 progress report does not refer to work on emergency measures on prioritised access to transport infrastructure. It does, however, refer to the December 2022 <a href="#">Directive on the resilience of critical entities (CER)</a> <sup>34</sup> . Transport is one of the essential services covered by this directive. Defence is outside the scope of the directive, however.	No additional information on work on emergency measures on prioritised access to transport infrastructure.	



<sup>33</sup> Joint report for November 2022 to October 2023: see paragraph 32 for action 11.

<sup>34</sup> Joint report for November 2022 to October 2023, paragraph 33.

Key action at EU level	Progress	ECA assessment	Traffic light
<b>PILLAR IV – The partnership dimension</b>			
ACTION 1: <i>“The EEAS together with Commission services and EDA will continue the EU-NATO Structured Dialogue on military mobility with a view to sharing information and ensuring coherence of respective work strands.”</i>	The November 2023 progress report <sup>35</sup> refers to the <a href="#">third EU-NATO Joint declaration signed in January 2023</a> . Article 11 states: “We have reached tangible results in ... military mobility ...”	NATO is the driving force behind military mobility in Europe. The EU military requirements and EU customs form 302, for instance, are largely inspired by their NATO equivalents.	
ACTION 2: <i>“The EEAS together with Commission services and EDA will include military mobility where necessary in the security and defence dialogues with relevant partners, notably with Canada, Norway and the US.”</i>	The November 2023 progress report <sup>36</sup> mentions the participation of the US, Canada and Norway in the PESCO military mobility project. <a href="#">In July 2022, the UK applied to join the project. Formal approval was subsequently given at a meeting of EU defence ministers on 15 November 2022.</a> The arrangements for the UK’s participation need to be finalised.	Ongoing.	

<sup>35</sup> Joint report for November 2022 to October 2023, paragraphs 37-39 for action 1.




<sup>36</sup> Joint report for November 2022 to October 2023, paragraph 38 for action 2.

Key action at EU level	Progress	ECA assessment	Traffic light
ACTION 3: <i>“The Commission services and the EEAS will explore dual use possibilities of the ongoing work on better connecting Member State’s main transport routes with a particular focus on Ukraine and Moldova.”</i>	The November 2023 progress report <sup>37</sup> refers to the TEN-T Regulation revision process. This revision will extend the TEN-T corridors, building on the <a href="#">Solidarity Lanes Initiative</a> launched in May 2022 by the Commission to help Ukraine keep its trade routes open following Russia’s blockade of Ukrainian ports.	Additional information: the ministries we visited expressed the view that the TEN-T Regulation revision could have been an opportunity for the EU to include the military requirements in the regulation and, therefore, to be able to use all EU-funded infrastructure as dual-use infrastructure meeting the EU military requirements. They recognised, however, that there are countries for which such an approach would have been very expensive and that this is why the revision did not include military requirements.	
ACTION 4: <i>“The EEAS and Commission services will explore possibilities to promote dialogue with regional partners, in particular enlargement countries, on best practices.”</i>	“Explore the possibilities to promote dialogue” is another example of an objective that cannot be considered to be <a href="#">SMART</a> as it is not specific, measurable or time-bound. The November 2023 progress report refers to “Connecting to other partners”.		





<sup>37</sup> Joint report for November 2022 to October 2023, paragraph 40 for action 3.



## Annex V – Visited member states’ feedback on invitations to act under Action Plan 2.0 – Additional information

Traffic lights colour code: green: completed or nearing completion, orange: ongoing, red: progress issues<sup>38</sup>.

EU member state invitation to act	Visited member states’ feedback	Traffic light
<b>PILLAR I – Multimodal corridors and logistical hubs</b>		
ACTION 1: <i>“Maintain and develop the network of national points of contact for military mobility.”</i>	Five of the seven member states visited have a formal network of national contact points for military mobility. In one member state, the contact points are instead designated on an ad-hoc basis. Another member state considered there was no need for a contact point because all key stakeholders knew each other and worked together closely.	
ACTION 2: <i>“Develop and submit dual-use infrastructure proposals...”</i>	All member states had developed and submitted dual-use infrastructure project proposals. Note: as per paragraph 58 and Figure 10, projects were selected for EU funding in 21 member states.	
ACTION 3: <i>“Contribute to the update of the Military Requirements for Military Mobility...”</i>	All member states had contributed to the update of the military requirements for military mobility.	

<sup>38</sup> For further information: see paragraph 77.

EU member state invitation to act	Visited member states' feedback	Traffic light
ACTION 4: <i>"By mid-2023, present to the Commission services and EEAS their national assessments of the physical networks' ability to meet the infrastructure requirements identified in the Military Requirements, to feed into the aforementioned study."</i>	The wording of this invitation to act was not clear for all member states. However, all except one confirmed that they had participated in the three-step analysis referred to in paragraph 35.	
ACTION 5: <i>"Look for synergies on energy efficiency in their national strategies to prepare the armed forces for climate change before the end of 2023, ..."</i>	All member states addressed energy efficiency in national strategies to prepare armed forces for climate change by the end of 2023, as called for in the Strategic Compass.	
<b>PILLAR II – Regulatory support measures</b>		
ACTION 1: <i>"Meet, by the end of 2023, the maximum 5 working days objective for border crossing procedures as part of the military mobility "pledge" agreed by the Council in June 2018 and explore the possibility of reducing the time to 3 working days for rapid reaction units, with a view to a possible update of the 'pledge'."</i>	The replies we received about meeting these objectives varied. The majority of the member states visited declared they had met the 5- and 3-days objectives and that the deadlines can even be much shorter than 5/3 working days in a crisis. At the same time, some of the member states visited indicated that further exercises will need to be conducted to confirm the achievement of targets and we did not obtain clear replies from a few others. We also noted that there were diverging interpretations on the scope of the target as some member states consider it only to be valid for the duration of Russia's war of aggression against Ukraine, whereas others stressed that the reference used by the EU (5 working days) differs from the one used by NATO (72 hours). In the light of the above, we consider that there are progress issues for this action.	
ACTION 2: <i>"Participate in and provide the necessary data for relevant studies undertaken at EU level."</i>	Member states differ in their understanding of "EU level". Some regard EDA and PESCO as EU-level bodies, while others do not. Therefore, some member states replied that they had provided such information while others told us they had not received any such requests.	

EU member state invitation to act	Visited member states' feedback	Traffic light
ACTION 3: <i>"Actively support the development of a Technical Arrangement for Cross Border Movement Permissions for the maritime domain."</i>	All member states actively supported the development of a technical arrangement for cross-border movement permissions for the maritime domain.	
<b>PILLAR III – Resilience and preparedness</b>		
ACTION 1: <i>"Ensure the cyber-resilience of the future digital processes and procedures, building on the EDA's work and exploring the possibility of developing functional requirements related to security."</i>	All member states we visited recognised the importance of such threats and are working on cyber-resilience and indicated to us various activities undertaken by them with regard to cyber-resilience. However, the action is defined in a way that does not enable us to clearly assess its completion as it lacks clear criteria, a baseline, milestones as well as a specific target. Therefore, it is not possible to conclude on member states' compliance with this action.	



# Abbreviations

**CEF:** Connecting Europe Facility

**CINEA:** European Climate, Infrastructure and Environment Executive Agency

**DG DEFIS:** Directorate-General for Defence Industry and Space

**DG MOVE:** Directorate-General Mobility and Transport

**EDA:** European Defence Agency

**EDF:** European Defence Fund

**EEAS:** European External Action Service

**EIB:** European Investment Bank

**EUMS:** European Union Military Staff

**HR/VP:** High Representative of the Union for Foreign Affairs and Security Policy / Vice-President of the Commission and President of the Foreign Affairs Council

**NATO:** North Atlantic Treaty Organization

**PESCO:** Permanent Structured Cooperation

**SDMMS:** Secure Digital Military Mobility System

**TEN-T:** Trans-European Transport Network

# Glossary

**Common Security and Defence Policy:** Part of EU foreign policy that focuses on security and defence capacity.

**Form 302:** Customs document, developed by NATO and later adopted by the EU for cross-border movements of military goods.

**Gap analysis:** Comparison between current performance and desired or expected performance in order to identify action required to address the gap.

**Strategic enabler:** Capability, capacity, or resource helps achieve a strategic goal.

# Replies of the Commission and the European External Action Service

<https://www.eca.europa.eu/en/publications/sr-2025-04>

## Timeline

<https://www.eca.europa.eu/en/publications/sr-2025-04>

## Audit team

The ECA's special reports set out the results of its audits of EU policies and programmes, or of management-related topics from specific budgetary areas. The ECA selects and designs these audit tasks to be of maximum impact by considering the risks to performance or compliance, the level of income or spending involved, forthcoming developments and political and public interest.

This performance audit was carried out by Audit Chamber III – External action, security and justice, headed by ECA Member Bettina Jakobsen. The audit was led by ECA Member Marek Opioła, supported by Kinga Wiśniewska-Danek, Head of Private Office and Bernard Witkoś, Private Office Attaché; Michael Bain, Principal Manager; Joël Costantzer, Head of Task; Flavia Di Marco and Laurent Olivier, Auditors. Michael Pyper provided linguistic support. Alexandra-Elena Mazilu-Dina provided graphical support.

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## HOW TO CITE

European Court of Auditors, [special report 04/2025](#): “EU military mobility – Full speed not reached due to design weaknesses and obstacles en route”, Publications Office of the European Union, 2025.

This audit examined the progress made regarding the EU policy on military mobility, focusing on the EU's second Action Plan (2.0) of November 2022. The plan was developed under time pressure, amid Russia's war of aggression against Ukraine. Overall, we conclude that Action Plan 2.0 was not built on sufficiently solid foundations. Progress towards the overall objective – ensuring swift and seamless movement of military personnel, materiel and assets at short notice and on a large scale – has so far been variable. To strengthen the EU's impact on military mobility, we recommend improvements in different areas, including governance, funding predictability and the selection of dual-use infrastructure projects under the post-2027 multiannual financial framework.

ECA special report pursuant to Article 287(4), second subparagraph, TFEU.



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Publications Office  
of the European Union

EUROPEAN COURT OF AUDITORS  
12, rue Alcide De Gasperi  
1615 Luxembourg  
LUXEMBOURG

Tel. +352 4398-1

Enquiries: [eca.europa.eu/en/contact](https://eca.europa.eu/en/contact)

Website: [eca.europa.eu](https://eca.europa.eu)

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