UPEI Position Paper on Military Mobility
(Answer to the targeted stakeholder consultation for the Military Mobility Package launched by the European Commission on 12 June)

31 July 2025.

Executive Summary

With this position paper, UPEI, the voice of Europe's independent energy and mobility suppliers, wishes to answer the targeted stakeholder consultation for the Military Mobility Package launched by the European Commission on 12 June.

This position paper highlights:

- The limited answer provided by UPEI, focused on fuel supply and energy infrastructures.
- The holistic dimension of access to relevant types of energy for military purposes.
- The need for a strong coordination of legal frameworks and operational instruments between the EU and its Member States,and with NATO.

Introduction

UPEI, the voice of Europe's independent energy and mobility suppliers, has observed with growing interest the efforts of the EU to become a major actor in the security of its populations, including its civilian, digital, and military aspects. Europe is confronted with urgent, massive and brutal security challenges that require a comprehensive approach. As suppliers of classical and advanced fuels to the transport, agriculture, construction, industry and the heating sectors, and of fuel payment instruments, our members play a decisive role in supplying energy to people, economic operators as well as armed forces (who often use the same infrastructures), and therefore in facilitating military mobility.

1. Targeted stakeholders' consultation

Since UPEI cannot answer most of the questions, we chose to focus on the elements of the targeted consultation of relevance:

- Transport of dangerous goods: the scope of Directive 2008/68/EC explicitly excludes vehicles, wagons or vessels belonging to or under the responsibility of the armed

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forces, so in principle this Directive is not an obstacle to military mobility within the EU.

- Access to fuel supply by armed forces: as the EU moves towards a decarbonised energy transport system, it is very important to ensure that military forces continue to be provided with the fuels required for their equipment, which may not necessarily follow the same decarbonisation path.
- Use by armed forces of (civilian) emergency oil stocks in the case of emergency or war: it is our understanding that each Member State has the necessary extraordinary legislation to be able to access such oil stocks in case of civilian or military emergency. However, bottlenecks remain, in countries where stocks are insufficient or located in another country, or in terms of coordination between Member States (extraordinary legislation or the instructional mechanisms to activate it du-differ widely)..

2. A holistic approach

Military mobility implies that the fuel distribution system remains permanently available. The decentralised nature of fuel supply (from the storage to the final consumer) provides some guarantees, but the following risks should be addressed:

- Natural disasters such as floods, major fires or earthquakes
- Major electricity blackouts (depots or service stations also run on electricity),
- Cyber-attacks: in this context, the exact scope of the NIS2 directive should be better clarified.
- Terrorist or military attacks on infrastructures, where the Critical Entities Resilience Directive adopted in October 2024 will play an important complementary role.

More generally, the entire fuel supply chain must be checked, and (national/crossborder) bottlenecks identified and corrected:

- In terms of supply from unfriendly or unreliable States, or through dangerous routes, which requires more indigenous production and refinery capacity
- In terms of organisation of the oil pipeline system, still focused on Western Europe whereas - for the foreseeable future - military mobility must focus on Central and Eastern Europe (the so-called "Eastern Flank of NATO").

As pointed out in a document of April 2025 produced by the think tank Bruegel,[1] there are converging interests between the defence and climate policies, not least through the strategic autonomy provided by the net-zero emission target or the need for critical raw materials both for the defence and the climate technologies. However, the defence timeline and specificities should be taken into account when further developing the EU climate policy, including to implement the 2040 target.

[1] Defence and climate: seven points for a common agenda

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3. Coordination between NATO and the EU and between EU Member States

Most EU Member States are also part of NATO, that has provided over the last 70 years the comprehensive framework of Europe's defence. Even if – or because – the Alliance is showing major signs of weakness, cooperation between both organisations must be further developed in the area of military mobility. One aspect concerns the completion of the supply network between Western and Central Europe. Whereas current plans foresee a rectification of this situation in the 10-25 years' timeframe, an acceleration of the process would require issue of infrastructure permitting legislation to be revised, and very consistent investments to be found.

Several Member States have already put in place consultation and coordination mechanisms involving all actors for the civilian and the military, including independent fuel suppliers, to elaborate capacities of resilience in case of major security issues on the energy infrastructure system.

It would be important that all Member States have plans and programmes in place in case of shortage of fuel. These distribution schemes should also help to determine where the potential bottlenecks are at European level),

Moreover, national plans for the usage of fuel and infrastructure in crisis scenarios, notably for the establishment of priorities, should be shared between the Member States - even confidentially - and a coordinated approach established at EU level.

Conclusion

UPEI members are very conscious of the huge security challenges posed to the European Union and its populations. Never, since the second world war, was our continent confronted with so numerous and brutal threats. They also are aware of their strategic role, notably in terms of provision of energy to the military mobility.

To be fully able to fulfil this role, they need to be provided with clear instructions and guidance under crises, whichever their nature and intensity.

UPEI stands ready to engage constructively with the European Commission for the preparation of the upcoming Military Mobility Package due by end 2005.

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UPEI, the voice of Europe's independent energy and mobility suppliers, represents nearly 2,000 European importers and wholesale/retail distributors of energy for the transport and *heating sectors, supplying Europe's customers independently of the major energy producers. They are the interface between producers and consumers, using their own infrastructure and flexibility to supply existing demand for conventional and renewable liquid fuels, as well as non-liquid alternatives as part of the energy transition. They cover more than a third of Europe's current demand. The organisation brings together national associations and suppliers across Europe. Independent fuel suppliers bring competition to Europe's energy market and are able to respond rapidly to changes affecting supply, contributing to security on a local, national and regional level. They have developed and maintain a comprehensive infrastructure for the sourcing, storage and distribution of transport and heating fuels, with a commitment to delivering a high-quality service to all consumers, including those in remote areas.*

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