ACTIVITIES REPORT 2024

CLECAT
European Association for Forwarding,
Transport, Logistics and Customs Services

Introduction from the President

The year 2024 marked a crucial period for CLECAT and the European freight forwarding and customs sectors. This report provides an overview of our extensive work across various policy areas, underscoring CLECAT's role in advocating for a competitive, resilient, and sustainable logistics sector. From customs reform and digital transformation to sustainability and decarbonisation, CLECAT has remained actively engaged in addressing the challenges and opportunities that define our industry. CLECAT worked diligently to ensure that the voice of our members was heard, promoting balanced policies that reflect operational realities.

In 2024, CLECAT played an active role in advancing the reform of the EU Customs Code, advocating to preserve existing customs facilitations for businesses, particularly those supported by customs intermediaries. We strongly opposed mandatory indirect representation, emphasising its potential to disrupt trade facilitation and competitiveness. Instead, CLECAT has championed a practical and inclusive approach to customs reform, prioritising the simplification of procedures, clarity in the role of intermediaries, and effective implementation of the Data Hub. These efforts included engaging policymakers during a special event under the Belgian Presidency and collaborating with stakeholders across the EU.

Beyond customs, CLECAT has contributed to key discussions on the Corporate Sustainability Reporting Directive (CSRD), the EU Emissions Trading System (ETS), and the Carbon Border Adjustment Mechanism (CBAM). These measures signal a new era of environmental accountability for businesses. CLECAT's focus has been on ensuring their implementation is both practical and aligned with broader sustainability objectives. CLECAT has highlighted the indispensable role of freight forwarders in mitigating supply chain disruptions and ensuring connectivity. We continue to call for increased investments in digitalisation, infrastructure, and multimodal transport solutions. These priorities underpin our efforts to enhance resilience and sustainability in the face of geopolitical and economic challenges.

Looking ahead, the European Commission's announced priorities for the next five years offer promising opportunities. The emphasis on pragmatic implementation, competitiveness, dialogue, and the reduction of bureaucracy and reporting obligations aligns with CLECAT's vision. As we turn to 2025, our focus will remain on ensuring that EU policies support the competitiveness of European businesses. Initiatives such as the Clean Industrial Deal and the Sustainable Transport Investment Plan will be essential in driving the energy transition and fostering a strong investment climate for Europe's industries.

As President of CLECAT, I am honoured to lead our association during this dynamic time. I look forward to continuing our collaboration with national associations and members to advocate for policies that strengthen the freight forwarding and logistics sectors, ensuring their vital contributions to Europe's economic growth and sustainability are recognised and supported.

Dimitri Sérafimoff
President, CLECATT

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European Elections

The European Parliament elections on 6-9 June 2024 and the formation of a new European Commission set the stage for shaping the Union's policy agenda in 2024. To ensure the voice of the freight forwarding, logistics, and customs sectors was heard, CLECAT developed and launched its **Strategic Priorities for 2024–2029**. This comprehensive campaign document outlines the challenges and opportunities facing the logistics and supply chain sectors and reflects CLECAT's vision for a sustainable, efficient, and competitive European logistics industry.

The CLECAT 10 Strategic Priorities for 2024-2029 outline key areas to enhance the logistics sector within the European Union. The ten main priorities are:

Discover our Strategic Priorities
(2024-2029)
#FreightForwardEU

1. **Reconsider Regulatory Strategies**: Advocate for a balanced approach to new regulations, ensuring they are practical and do not overburden businesses, especially SMEs.

2. **Strengthen the Single Market and the EU's Competitiveness**: Promote the removal of barriers to cross-border transport and logistics services, enhancing the free movement of goods, services, and people across the EU.

3. **Ensure Fair Competition and a Level Playing Field**: Monitor market dynamics to prevent dominance by certain players and ensure fair competition across all transport modes.

4. **Support the Green Transition**: Encourage initiatives that actively support the decarbonisation of all transport modes, aligning with the EU's climate objectives.

5. **Support Resilience in the New Geopolitical Context**: Integrate resilience into policies by improving regulatory systems to be more agile and flexible in coping with crises.

6. **Secure a Sound and Balanced Customs Reform**: Advocate for customs reforms that simplify procedures and reduce administrative burdens, facilitating smoother trade operations.

7. **Digital Transformation Supporting European Transport and Logistics**: Promote digitalisation to enhance efficiency, cost reduction, and resource optimisation in the logistics sector.

8. **Strengthening the Connecting Europe Facility for Efficient Cross-Border Transport Infrastructure**: Ensure progress towards efficient, reliable, and high-quality transport infrastructure across all modes, focusing on cross-border connections.

9. **Enhance Skills and Trainings for the Logistics Sector**: Address workforce shortages by promoting education and vocational training that align with business needs, attracting new talent to the sector.

10. **Efficient and Interconnected Freight Transport**: Improve the efficiency of each transport mode and enhance modal interoperability and multimodal optimisation, recognising the complementary nature of different transport modes.

Advancing trade, customs and indirect taxation

Shaping Policy with Industry Expertise

Throughout 2024, CLECAT has been actively shaping the development of key legislative initiatives in the customs domain by participating in European Commission public consultations. Through comprehensive position papers and detailed feedback, we contributed to significant policy proposals, including the EU Customs Reform, the Carbon Border Adjustment Mechanism (CBAM), and the EU Deforestation Regulation (EUDR). CLECAT emphasised the need to align these proposals with the operational realities of trade, focusing on challenges faced by SMEs and the importance of clear and realistic implementation timelines. Leveraging the expertise of its members, CLECAT provided policymakers with practical, data-driven recommendations to foster efficient, balanced, and forward-looking customs policies tailored to the needs of the logistics and freight forwarding sectors. This work was carried out in close collaboration with CLECAT's Customs and Indirect Taxation Institute (CITI).

In September 2024, CITI convened its institute meeting in Budapest, hosted by the Hungarian Association of Customs Agents (MVSZ) under the Hungarian Presidency of the Council of the EU. The event brought together industry representatives and stakeholders from across Europe to address key customs priorities and challenges. Discussions centred on pressing issues such as the EU Customs Reform, the implementation of ICS2, and the 2025 conclusion of the UCC Work Programme. The meeting underscored the critical role of national customs authorities in shaping EU customs policies and provided a platform for aligning strategies and sharing insights across the sector.

Throughout 2024, CLECAT had opportunities to share its expertise at numerous high-level events. In June, the association participated in an event organised by the Belgian Presidency in Liège, offering insights into trade concerns surrounding the EU Customs Reform. In October, CLECAT presented its views on the EU Deforestation Regulation (EUDR) during ESPO's Customs Committee meeting, addressing operational challenges and potential solutions. CLECAT contributed to the ERCST's international town hall meeting on CBAM in December, where its representative joined a panel to discuss the transition period's most significant challenges and expectations for the definitive phase in 2026. These opportunities underscored CLECAT's role as a trusted partner in shaping EU customs and trade policy.

Collaboration through the Trade Contact Group (TCG)

CLECAT has effectively leveraged its membership in the Trade Contact Group (TCG) to strengthen cooperation between trade and regulatory bodies, particularly with regards to the customs reform and addressing compliance challenges. Recognizing the need for targeted dialogue, CLECAT proposed the establishment of specialized working groups in the Informal TCG to address critical issues such as e-commerce compliance and the implementation of non-fiscal customs regulations.

By co-drafting joint industry letters and positions (see the joint initiative on the customs reform) and contributing strategically to discussions, CLECAT has ensured the logistics sector's interests are well-represented in interactions with DG TAXUD and other stakeholders.

The association also emphasized the importance of an inclusive and efficient format for the TCG to address broader regulatory challenges such as the EU Deforestation Regulation (EUDR), Carbon Border Adjustment Mechanism (CBAM), and the Customs Reform. Proposals include a dedicated forum for structured discussions with the Commission and Member States, aimed at ensuring alignment on implementation strategies and enhancing Europe's competitive position. CLECAT's contributions continue to underscore the need for greater collaboration between trade associations and policymakers, advocating for a balanced approach that promotes both trade facilitation and regulatory compliance.

EU Customs Reform: Advocacy for Practical Solutions

CLECAT has been deeply engaged in discussions surrounding the EU Customs Reform, contributing extensively to debates on the establishment of the EU Customs Authority (EUCA) and the Customs Data Hub (EUDH). The association emphasized the need for a phased implementation approach to ensure all Member States are adequately prepared for these substantial changes. CLECAT also raised concerns about the potential over-centralization of customs processes, advocating for a balanced approach that preserves the critical role of customs intermediaries, particularly small and medium-sized enterprises (SMEs).

In its interactions with policymakers, CLECAT strongly opposed the concept of a Single Reliable Person, highlighting that it is unviable in modern, complex supply chains. The association argued that mandating indirect customs representation as a condition for access to facilitations in the case of EU-based importers constitutes unnecessary regulatory overreach. Such a measure would create two classes of EU importers and undermine the principle of fair competition. CLECAT emphasized that facilitations must remain accessible without imposing restrictions through intermediaries. The current trade

facilitation structure is already well-functioning, with intermediaries, often Authorized Economic Operators (AEOs), playing an important role.

CLECAT also stressed the importance of separating e-commerce measures into a distinct legislative framework to allow targeted solutions to be developed without delaying the reform's broader objectives. The association actively supported members in aligning their positions on critical aspects, offering expert analysis and proposing amendments that reflect trade realities.

Throughout 2024, CLECAT held a series of high-level meetings with Members of the European Parliament (MEPs) and Permanent Representations to the EU, including those of the Netherlands, Ireland, Hungary, Germany, Italy, Finland, Sweden, and France. These discussions centered on CLECAT's position paper and key concerns, including the role of customs intermediaries, the integration of non-customs trade obligations into the reform, and practical trade facilitation measures. CLECAT highlighted the importance of preserving the current system, which enables intermediaries to extend their authorizations and guarantees to traders of all sizes, fostering inclusivity and efficiency across the supply chain.

EU Deforestation Regulation (EUDR): Supporting Compliance

CLECAT has been actively addressing the implications of the EU Deforestation Regulation (EUDR) on customs processes, which introduce stringent requirements for submitting Due Diligence Statements (DDS) and verifying compliance at entry points. Recognizing the significant operational challenges posed by these obligations, CLECAT successfully advocated for practical solutions, including the European Commission's decision to grant a one-year delay in implementation. This additional time provides businesses with a critical opportunity to prepare for compliance without risking severe disruptions at borders.

In its engagement with the European Commission and national customs authorities, CLECAT highlighted the importance of clear and actionable guidance to help businesses navigate the DDS process and understand exemptions. The association has also provided its members with regular updates on regulatory developments, ensuring they are equipped with the information needed to meet these new obligations. CLECAT continues to advocate for measures to streamline implementation, such as integrating EUDR requirements into existing customs systems and ensuring staggered compliance deadlines. These efforts aim to support the logistics sector in achieving compliance while maintaining the efficiency of supply chains.
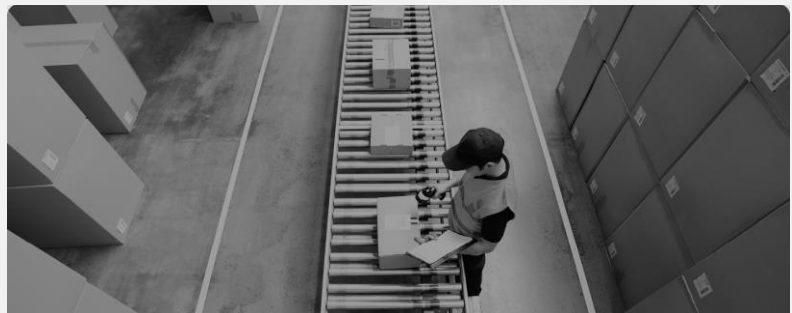
Carbon Border Adjustment Mechanism (CBAM): Simplifying Processes

The implementation of the Carbon Border Adjustment Mechanism (CBAM) has been a significant focus for CLECAT, which has worked to ensure the mechanism achieves its environmental goals without imposing excessive burdens on trade. CLECAT has actively participated in consultations on the secondary legislation, advocating for streamlined administrative processes, including thresholds for small shipments and simplified reporting requirements to reduce the impact on occasional importers and SMEs.

Near the end of 2024 CLECAT welcomed the Commission's acknowledgment of the need for a simplification package, underlining the importance of creating a workable CBAM framework that functions as an environmental tool rather than a barrier to trade. Although CLECAT members are not directly responsible for importing CBAM goods, they play a critical role in facilitating shipping and customs clearance, which positions CLECAT to provide practical insights into the mechanism's implementation. CLECAT has urged the Commission to ensure this revision avoids repeating past mistakes by simplifying processes, addressing delays in authorizations, and fully engaging with stakeholders. At a public meeting where CLECAT spoke about these challenges, it underlined that we remain committed to supporting the development of an efficient, balanced CBAM framework that aligns with the EU's climate goals while maintaining the competitiveness of European trade.

Driving Digital Transformation in Customs

CLECAT has continued to champion the digital transformation of customs processes, addressing inconsistencies in the implementation of systems such as NCTS and AES. The association worked to resolve issues related to data quality and system integration, providing feedback to the European Commission and Member States on areas where improvements were needed.

CLECAT supported the EU Single Window initiative, advocating for seamless data exchange and integration across customs platforms. The association also addressed challenges related to the transition from manual processes to fully digital systems, ensuring that these changes enhance, rather than hinder, trade facilitation.

Raising awareness and improving operational readiness

CLECAT has continued its active engagement and cooperation with UK authorities throughout 2024, contributing significantly to the successful phased roll-out of the UK Border Target Operating Model (BTOM). Through regular dialogue with HMRC and the UK Mission to the EU, CLECAT has supported the UK Government's preparedness efforts, ensuring EU businesses are well-informed and operationally ready for the changes introduced under the BTOM. This has included the dissemination of official guidance and information to CLECAT's members and the wider EU business community, facilitating a seamless adaptation to the evolving border framework.

As part of its efforts related to the BTOM, CLECAT has closely monitored key implementation milestones. In January 2024, health certification requirements were introduced for medium-risk animal products, plant products, and high-risk food and feed of non-animal origin from the EU. This

was followed in April by the commencement of documentary and risk-based identity checks. CLECAT has played a central role in raising awareness of these changes, ensuring members are informed about new import requirements and processes, and supporting their operational readiness.

CLECAT's active participation in the EU-UK Intermediaries Task Force (ITF) has also been helpful in addressing practical challenges associated with border crossings and trade facilitation. Furthermore, regular feedback sessions with members have allowed CLECAT to gather insights on the implementation of the Trade and Cooperation Agreement (TCA) and other border formalities, fostering knowledge-sharing and collaborative problem-solving.

In addition to its direct support to members, CLECAT has worked with UK authorities to facilitate their outreach to EU businesses, helping bridge gaps in understanding and ensuring preparedness across both sides of the border.

Customs and Sanctions Monitoring

In 2024, CLECAT closely monitored and informed its members about the evolving EU sanctions against Russia, including the adoption of the 14th and 15th sanctions packages. These measures introduced stricter trade restrictions, including export bans on dual-use and advanced technology items, industrial goods, and Russian diamonds, as well as import bans on helium. Transport-related measures targeted Russia's "shadow fleet," banning additional tankers from EU ports and tightening restrictions on vessels aiding Russia's warfare. The packages also strengthened safeguards for EU operators against economic interference and intellectual property theft.

CLECAT provided timely updates on these developments, highlighting their operational impact on freight forwarders and offering guidance on compliance. By engaging with the European Commission and Member States, CLECAT supported the effective implementation of sanctions and ensured its members were equipped to navigate these complex regulatory changes.

Ensuring security of logistics supply chains

Continue supporting the implementation of ICS2

The rollout of ICS2 presented significant challenges for the logistics industry. CLECAT worked closely with its members to ensure readiness, offering detailed guidance on managing responsibilities for multiple filings and integrating the system with other platforms like the New Computerized Transit System (NCTS) and the Automated Export System (AES). Regular consultations and technical discussions were held to address issues such as discrepancies in HS code usage, data accuracy concerns, and inconsistencies in implementation timelines across Member States. Concerns with regards to Release 2 – for air freight – were regulatory brought to the attention of the European Commission. CLECAT advocated for clear deployment schedules and highlighted the need for improved support services, including 24/7 national helpdesks, to prevent operational disruptions.

CLECAT and other associations met on these issues with DG TAXUD in June, and took the lead in drafting the industry recommendations letter. DG TAXUD in response promised to address ongoing system issues and reduce risks ahead of Release 3.

With the entry into force of ICS2 Release 3 in December 2024 for maritime and inland waterways transport house-level filers, CLECAT made efforts to develop guidance materials, organise informational meetings, and collaborate with IT service providers like CONEX, to ensure compliance with the new requirements. CLECAT developed a comprehensive best practices document which includes technical resources and clear information aimed at helping freight forwarders to comply with the new requirements. These efforts underscored the importance of multiple filings to improve service reliability and safeguard business confidentiality.

CLECAT monitored carrier readiness and advocated for fair practices to prevent undue burdens on forwarders. It also participated in the various Trans-European Coordinating Meetings with Member States and the Commission throughout 2024 and all ICS2 Technical-Operational meetings, where the state of play, progress, and communication-related aspects were discussed with DG TAXUD and Member States.

CLECAT remains committed to monitoring both ICS2 Release 2 and Release 3 to ensure enhanced security without disrupting the daily operations of European freight forwarders, also continuing collaborating with members and policymakers to streamline processes and better support the European freight forwarding industry.

Balancing Air Cargo Security and Competitiveness

Following the sudden implementation of stricter security measures by the US in late summer for air cargo destined for its market from Europe, in response to a series of air cargo incidents, CLECAT actively worked to ensure enhanced security without hindering global supply chain operations.

Challenges included a lack of communication from US authorities to stakeholders regarding the implementation of stricter requirements, such as the proof of an Established Business Relationship (EBR) and the addition of mandatory data elements in the Air Cargo Advance Screening (ACAS) filing. Through consistent advocacy, CLECAT successfully negotiated amendments to these requirements, reducing some operational disruptions.

As part of its advocacy efforts, CLECAT addressed these concerns in a letter to the European Commission as early as September. CLECAT also secured representation during high-level EU-US meetings in Washington to directly explain why certain provisions proposed would lead to additional administrative burdens without enhancing security. CLECAT supported broader collaboration with authorities and stakeholders to ensure effective and necessary communication channels were in place, ensuring the operational feasibility of all requirements suggested by US and EU authorities before their introduction. Industry cooperation was emphasised to highlight the need to enhance security frameworks, close existing loopholes, and avoid hindering the competitiveness of European stakeholders.

CLECAT continued its efforts to shape EU legislation in the field of supply chain security by providing comments on the proposal for amendments of the Commission's Implementing Legislation. This legislation aims to address the shortcomings exposed by the air cargo incidents, with the aim of making the US's stricter measures redundant. Throughout this entire process, CLECAT has worked closely with its members to communicate proposed amendments and ensure that these new regulatory requirements address the security vulnerabilities while aligning with operational practices.

Safe and Secure Truck Parking Areas (SSTPAs) throughout the EU

The rising incidents of cargo theft across Europe in 2024 have highlighted the urgent need for safe and secure parking facilities. In response, CLECAT actively contributed to the European Commission's ongoing study on the availability and quality of rest areas for professional drivers and secure parking facilities along the TEN-T network. In addressing the critical gaps in parking infrastructure, CLECAT served in the Stakeholder Advisory Board of the study. CLECAT's feedback particularly emphasised qualitative improvements, advocating for better working conditions for drivers and the establishment of high-security SSTPAs in regions prone to high traffic and cargo theft.

The study revealed serious deficiencies in both the availability and quality of parking facilities, underscoring drivers' concerns about safety, cleanliness, and access to real-time information on available spaces. CLECAT advocated for certified parking areas along the TEN-T network and called for targeted EU funding to address these shortcomings. The final results of this study will be presented in 2025.

Through the Connecting Europe Facility (CEF) program, CLECAT supported calls for proposals that allocated €320 million for SSTPA projects in 2024, a substantial increase from previous years. These initiatives aim to improve driver safety, enhance cargo security, and boost operational efficiency, while integrating sustainable practices such as the Green Parking concept into parking infrastructure. As part of its awareness-raising efforts, CLECAT joined the European Commission on the international jury for the 2024 Excellence in Truck Parking Award, recognising outstanding parking solutions. The association also kept its members informed about the latest CEF funding call for SSTPAs, providing guidance on factors that increase the likelihood of securing project funding.

Enhancing European Port Security

CLECAT has been actively engaged in the [European Ports Alliance Public Private Partnership](#) (PPP) initiative, launched earlier in 2024 to combat drug trafficking and organized crime threatening European ports and logistics hubs. The European Commission has since drafted a work program divided into four clusters: operational cooperation, fighting infiltration and corruption, policy development and compliance, and innovation and technology.

At the end of 2024 a workshop under Cluster I of the European Ports Alliance highlighted the e critical need for collaboration to address organized crime in ports. Participants stressed the importance of trust and patience in establishing partnerships, with clear frameworks and defined roles for data sharing. Operational efficiency, achieved through coordinated efforts, was seen as a key benefit of these collaborations, helping to avoid redundant investigations. The workshop also underscored the

need to engage private actors more actively in the fight against organized crime. Demonstrating the tangible benefits of collaboration and the risks of inaction can motivate participation.

Another key point raised was the so-called "waterbed effect," where drug trafficking shifts to other ports, transport modes, or parts of the supply chain when countermeasures are introduced. Addressing this phenomenon is crucial to the broader success of the European Ports Alliance initiative and its future scope. CLECAT will continue to engage with stakeholders, leveraging insights and best practices from these discussions to inform its contributions to EU port security policies and the European Ports Alliance work program. Looking ahead, CLECAT will contribute to the forthcoming EU Port Strategy, expected during the new term of the European Commission. This input will focus on strengthening port security legislation, potentially through measures like background checks modelled after those in air cargo logistics.

Strengthening Europe's Preparedness and Resilience

In the face of growing external threats, CLECAT has also been following recent EU developments to strengthen the security and resilience of the Union, including through the development of dual-use transport infrastructure corridors on the TEN-T. In 2024, CLECAT contributed to discussions on enhancing Europe's preparedness and resilience in response to multidimensional crises. This work aligns with the objectives outlined by Special Adviser Sauli Niinistö, tasked by the European Commission to assess Europe's civilian and military readiness.

CLECAT participated in a high-level consultation, providing insights on the importance of integrating public-private partnerships and addressing infrastructure challenges related to both civilian and military mobility. The dialogue underscored the critical role of the logistics sector and transport infrastructure in supporting both strategic preparedness and the smooth functioning of the EU internal market.

CLECAT joined forces with stakeholders in an initiative to urge Member States to prioritize a centralised funding mechanism under the future EU budget. The discussions reiterated the importance of transport infrastructure in Europe's industrial competitiveness, military mobility, and climate ambitions. CLECAT continued to advocate for addressing bottlenecks, completing missing links, and enhancing connectivity to strengthen Europe's economic and social cohesion. With rising geopolitical tensions and climate change challenges, CLECAT remains committed to ensuring that Europe's transport network remains a pillar of the EU's resilience and supply chain sovereignty.

High level of Cybersecurity in the EU Transport Sector

The importance of a robust cybersecurity framework, consistently advocated for by CLECAT, has gained increasing prominence in recent years. The transport sector is currently the third most targeted by cyber incidents in the EU. Since Russia's war of aggression against Ukraine, cyberattacks in the EU have escalated, with the European Union Agency for Cybersecurity (ENISA) identifying the transport sector as one of the most frequently targeted industries.

In response to these growing challenges, CLECAT closely monitored the transposition of the NIS2 Directive by Member States and its implications for logistics operators. Recently, the European Commission initiated infringement procedures against 23 Member States, urging them to act promptly to transpose the Directive. This underscores the critical need to protect infrastructure and secure sensitive supply chain data.

In May, CLECAT joined the Transport Cybersecurity Conference in Brussels, organised by DG MOVE, DG CNECT, and key EU transport and cybersecurity agencies. The event brought together transport stakeholders and policymakers to address the urgent need for stronger cybersecurity measures. The event recognised that while the EU has introduced pivotal legislation, such as the NIS2 Directive and the Cyber Resilience Act, focus must now shift to implementation. Stakeholders emphasised the importance of guidance and collaboration to ensure smooth and effective compliance across the sector. Also, efficient reporting mechanisms are necessary to ensure safety and security without imposing undue administrative burdens on industry stakeholders. Collaboration between authorities and industry is essential for effective implementation.

Air Freight Logistics: Balancing Capacity, Quality, and Sustainability

Enhancing ground handling services and ensuring fair slot allocation

Following delays in the legislative review processes due to the COVID-19 pandemic, the European Commission launched a fitness check of the EU airport legislation, which aims at determining if the legislation is still fit for purpose considering recent trends such as capacity challenges, competition and the need to decarbonise the sector. The three legislations include 1) the Slot Regulation (EEC) No 95/93 2) the Groundhandling Directive 96/97/EC 3) the Airport Charges Directive 2009/12/EC.

CLECAT submitted a feedback paper in June 2024, providing comments on the EU Slot Regulation and the Groundhandling Directive. Regarding the EU Slots Regulation, CLECAT highlighted that the Regulation is inadequate to address the growing congestion at EU airports, arguing a mechanism to allocate slots in view of the limited airport capacity. On the Groundhandling Directive, CLECAT raised concerns regarding the lack of quality and service levels provided by Ground handlers at EU airports, with limited competition that hinders service quality.

In the context to the lack of quality of ground handling services in EU airports, CLECAT drafted a survey to gather detailed feedback from its members on what this issue entails. The survey findings will provide crucial evidence to CLECAT for the upcoming public consultation on EU airport legislation, expected to open in the first half of 2025.

Fostering the sustainability of air transport

CLECAT remains committed to the sector's decarbonisation, as set by the ambitious targets of the RefuelEU Aviation. However, this important objective must be achieved without compromising the sector's competitiveness. CLECAT has co-signed a letter for the introduction of a Sustainable Aviation Fuel (SAF) Book & Claim mechanism, as it is paramount to avoid structural imbalances and to reduce overall costs in the EU's SAF market while ensuring an efficient deployment across the EU. CLECAT also co-signed a letter addressed to the Transport and Tourism Committee of the European Parliament advocating for a Book & Claim mechanism, urging MEPs to demand the Commission to publish a report focused on assessing improvements or additional measures to the existing flexibility system for SAF.

This has become even more urgent in view of a report published in December 2024 by the European Union Aviation Safety Agency (EASA) *'State of the EU Sustainable Aviation Fuels (SAF) Market in 2023'*, which notes that none of the SAF projects in the EU have reached a final investment decision. In the context of air freight sustainability, CLECAT has submitted a series of questions to MEPs for the Commissioners hearings, including on the SAF Book & Claim mechanism.

Sustainable Logistics

Advancing Emissions Measurement

CLECAT strongly supported the use of ISO 14083 standard as the methodological foundation for emission calculations in transport, ensuring consistency with international best practices. CLECAT highlighted the need for user-friendly tools and detailed implementation guidelines, enabling businesses to adapt effectively to the new requirements. To this end, CLECAT published the ISO 14083 Guide, a comprehensive resource tailored to freight forwarders. The guide is the English translation of the publication by the German Federal Environment Agency. It has been reviewed and updated by CLECAT to ensure its relevance and applicability for the broader European logistics sector. It includes practical case examples and a detailed list of key emission factors, making it an essential reference for freight forwarders responding to increasingly complex environmental reporting requirements.

CLECAT supported broader initiatives to improve emissions transparency and reporting. We collaborated on the development of the GLEC Framework 3.1, which introduced updates to methodologies for reporting emissions from biofuels and electric vehicles. CLECAT's participation in the SFC Assurance Stakeholder Committee further demonstrated its commitment to ensuring robust and credible emissions reporting practices.

CountEmissions EU

CLECAT played a key role in shaping the proposal for a CountEmissions EU Regulation, which seeks to standardise GHG emissions reporting across the transport sector. In our policy response, we welcomed the Commission proposal, notably the use of the ISO 14083 standard as the methodology to calculate and report emissions from transport services in the EU. Recognising the potential complexity of the Regulation, CLECAT engaged in extensive dialogue with policymakers to advocate for a practical and equitable framework.

During the legislative process, CLECAT has raised concerns about the potential introduction of life-cycle emissions methodology in the Regulation, further complexifying GHG reporting. Mandating the use of primary data would also overburden companies at a stage when logistics companies must be actively supported to engage in GHG measuring and reporting in the most flexible way. During the trilogue negotiations, CLECAT will continue to promote its position towards policymakers to make CountEmissions EU practical, effective and focused.

Greening Corporate Fleets

In 2024, CLECAT intensified its focus on facilitating the green transition of corporate fleets, a critical element of achieving EU decarbonization goals. Through its engagement with the European Commission's "Greening Corporate Fleets" initiative, CLECAT underscored the need for a comprehensive strategy that balances ambitious sustainability targets with practical support measures. One of the central challenges addressed was the inadequacy of charging and refuelling infrastructure, particularly for heavy-duty vehicles (HDVs). CLECAT advocated for significant investment in both depot charging stations and public networks to accommodate the projected growth in battery-electric trucks. The issue of grid capacity emerged as a major barrier, prompting the need for streamlined permitting processes and grid enhancements to meet increased energy demands.

CLECAT also advocated for financing mechanisms that could lower the high upfront costs of zero-emission vehicles, including public guarantees, tax incentives, and de-risking schemes designed to attract investment and provide financial certainty to logistics operators. We also highlighted that the low availability of ZEV models and long lead times for receiving new vehicles contribute to the transition obstacles experienced within the transport sector.

In its position paper accompanying its response to the Commissions' public consultation, CLECAT argues that a mandatory share of ZEV in the acquisitions or in the fleets of road transport operators would not be the right tool to drive the decarbonisation of road freight transport and could potentially lead to adverse effects. Instead, the Commission and Member States should focus on providing the right framework (adequate charging/refuelling infrastructure, grid capacity and grid connections) to ensure a successful transition to zero-emission trucking.

Supporting Compliance with Emerging Regulations

CLECAT actively supported its members in navigating new regulatory requirements, including the Corporate Sustainability Reporting Directive (CSRD) and the Packaging and Packaging Waste Regulation (PPWR). For the CSRD, CLECAT organised workshops and developed a repository of guidance documents to help freight forwarders understand and meet their reporting obligations. We also actively participated in the ongoing development of sector-specific reporting standards, while ensuring administrative burden to logistics companies is reduced to the minimum. With respect to the PPWR, CLECAT advocated for harmonised reuse targets across Member States and sought clarity on specific requirements for transport and e-commerce packaging, ensuring alignment with the needs of the logistics sector.

Promoting Sustainable Fuels

CLECAT continued its efforts to advance the adoption of sustainable fuels across transport modes. In aviation, we advocated for the inclusion of book-and-claim mechanisms in the ReFuelEU Aviation Regulation, which aim to scale up the use of Sustainable Aviation Fuels (SAFs) by bridging cost and supply gaps, allowing for more competitive pricing and more robust market demand signals, enabling more investment in European SAF production.

In the maritime sector, CLECAT pushed for measures supporting the uptake of alternative fuels at both EU and global level. The application of FuelEU Maritime in 2025 should push the industry to develop sustainable shipping solutions provided those revenues stemming from climate-related measures (ETS, FuelEU, and other similar CO_2 taxation) are invested into developing climate-neutral solutions. Ongoing negotiations on decarbonisation measures at IMO should also encourage the uptake of sustainable solutions at global level, avoiding carbon leakage and providing a level-playing field.

Robust and efficient rail freight sector

Improving the Quality of Rail Freight

Improving the quality of rail freight services continues to be a challenge for the industry as despite modal shift efforts, the modal share of rail freight in inland freight transport has remained stable at around 17% over recent years. For this reason, CLECAT conducted a survey amongst its members to better understand quality issues within the European rail freight sector, revealing significant shortcomings, including unreliable schedules, poor Estimated Time of Arrival (ETA) systems, and inadequate infrastructure.

These findings prompted CLECAT to prioritise advocacy for improved ETA systems, Key Performance Indicators (KPIs) and increased infrastructure investment to enhance rail freight's reliability and competitiveness. CLECAT also organised an exchange of views with European Commission representatives working on rail freight topics, presenting the survey results during an Institute meeting. The Commission acknowledged the lack of service quality as a major barrier to achieving a modal shift towards greener transport modes.

Since ETA systems have been considered key by European freight forwarders to increase the modal share of rail freight transport, CLECAT has emphasised in its feedback paper on the draft Land and Multimodal Transport Guidelines (LMTG) and draft Transport Block Exemption Regulation (TBER) the need for a higher aid threshold for traffic forecast software systems and route optimisation tools, which are vital to improving the reliability of sustainable land transport.

CLECAT will continue to advocate for improved rail freight infrastructure and service quality, ensuring that the needs of rail freight end users are addressed while promoting multimodal transport to boost rail freight transport.

Revision of the Combined Transport Directive

CLECAT actively contributed to discussions on the revision of the Combined Transport Directive as proposed by the European Commission in November 2023, focusing on definitions, operational methodologies, and practical implementation timelines. In February 2024, CLECAT released its position paper advocating for a balanced approach to criteria for suitable terminals, and the phased integration of eFTI platforms, ensuring that intermodal operations remain competitive while aligning with decarbonization goals.

In light of the European Parliament recess before the European elections in June, CLECAT focused its efforts in the first half of the year on exchanges with the Council Working Party on Transport - Intermodal Questions and Networks, where divergent views among Member States have halted the adoption of a General Approach (GA). CLECAT held meetings with key Member State representatives to present its position and gather information on the ongoing discussions. As a result, CLECAT submitted a feedback paper expressing concerns about the risk of supporting an unclear and disharmonised CT definition, which would fail to enhance the current Directive. In response to the Hungarian Presidency's proposal presented to Member States in autumn, CLECAT provided comments supporting a single and harmonised definition, the Presidency's compromise on the provision related to the nearest suitable terminal, and the harmonisation of supporting measures. CLECAT will continue to monitor discussions between Member States under the Polish Presidency.

The European Parliament has not yet started working on the revision of the legislation in view of the Commission's hearings, but it is expected to begin in January or February 2025. CLECAT has established contacts with the office of the Rapporteur, Mr Flavio Tosi (EPP, IT), and the Shadow Rapporteurs from the main political groups. The revised Directive has the potential to significantly boost Europe's transition to sustainable transport modes, but achieving this will depend on ensuring clarity, simplicity, and broad-based support for infrastructure development.

Improving the use of Rail Capacity Infrastructure

CLECAT was involved in advocacy initiatives throughout the year on the Commission's proposal for the European Railway Capacity Management Regulation, issued on 10 July 2023. The regulation is of critical importance as it aims to address capacity bottlenecks and increase infrastructure use, potentially unlocking 4% additional capacity - the equivalent of an €8 billion investment in new

infrastructure. CLECAT actively supported the overall objectives and provisions of the proposal, which align with its commitment to improving the reliability and efficiency of rail freight services.

In collaboration with other industry associations, CLECAT's advocacy efforts contributed to the European Parliament adopting a position that reflects CLECAT's position paper. However, challenges remain due to the nationally focused positions of Member States, as reflected in the General Approach adopted on 17 June 2024 under the Belgian Presidency. CLECAT and other trade associations responded by publishing a joint statement expressing concerns about the Council's position, warning that it risks perpetuating inefficiencies in rail freight operations by maintaining a fragmented, national approach to capacity management.

As trilogue negotiations resumed in November 2024, CLECAT continued to push for a final agreement that transitions railway capacity management from a manual, national, and rigid system to one that is digital, international, and flexible. Such a framework is vital for modern freight transport, where over half of trains operate across national borders. CLECAT joined forces with 11 industry associations at the end of 2024 to issue a joint open letter urging policymakers to adopt an ambitious and international approach to the regulation.

Ensuring clean and efficient road freight transport

Weights and Dimensions Directive

CLECAT has been actively involved in the legislative discussions concerning the revision of the Weights and Dimensions Directive (Directive 96/53/EC). We advocated for harmonised rules to permit the cross-border use of longer and heavier vehicles, particularly zero-emission trucks, aiming to enhance operational efficiency and reduce emissions.

In its position paper, CLECAT welcomed the European Commission's proposal to allow extra weight—up to 4 tonnes—and extra length—up to 90 cm—for zero-emission vehicles to compensate for the weight and bulk of zero-emission propulsion systems and associated equipment, both in road-only and intermodal transport. CLECAT also supported the proposal to allow cross-border traffic of 44-tonne trucks between countries allowing their national circulation, and raising the maximum weight for lorries engaged in intermodal and combined transport operations to 46 tonnes. However, CLECAT considers that this possibility should not be restricted in time for conventional vehicles, as there are still uncertainties on the uptake of zero-emission vehicles in long-haul transport in a short-to medium term. Furthermore, CLECAT has supported the use of longer and heavier vehicles, including European Modular System (EMS) vehicles, in cross-border traffic, at least between countries allowing them at national level.

CLECAT engaged with policymakers throughout the year, meeting MEPs and Member States' representatives responsible for the file and issuing voting recommendations in February and March 2024. We also emphasised that the EMS provisions in the Commission proposal would bring more efficiency to the road freight supply chain while avoiding a potential reverse modal shift. During the negotiations at Council level and upcoming trilogues, CLECAT will continue to advocate for a more efficient low-emission transport system with clarified rules for cross-border operations, aligning with

the EU's climate ambitions and addressing the structural shortage of drivers affecting road transport supply chains.

Decarbonisation of road freight transport

CLECAT supported the decarbonisation of road freight transport by disseminating best practices from the industry and research projects on the use of low- and zero-emission commercial vehicles. Through its membership to the [European Clean Trucking Alliance](#) (ECTA), the Secretariat has engaged with policymakers to provide the right enabling conditions for the uptake of zero-emission heavy-duty vehicles. The Alliance also provides a platform to exchange on the use cases and best practices from its company members in the operation of zero-emission trucks and their corresponding charging/refuelling infrastructure.

In addition, CLECAT closely follows the development of the [ZEFES project](#), aiming to develop use-cases for long-haul zero-emission trucking across Europe. The Secretariat participated in the annual stakeholder meeting and delivered a keynote speech reflecting on the current and upcoming legislative framework supporting the decarbonisation of road freight transport.

A key concern raised by CLECAT is the significant lack of charging and refuelling infrastructure, particularly for heavy-duty vehicles. The association urged the European Commission to prioritize grid upgrades, streamline permitting processes, and deploy smart charging technologies to meet the increasing demand. Additionally, it stressed the importance of reducing the high upfront costs of ZEVs through grants, tax incentives, and public-private financing schemes, while calling for EU-level harmonisation of fiscal measures to avoid market distortions.

CLECAT responded to the Clean Corporate Fleets consultation by emphasising the need for enabling conditions over mandatory quotas to drive the adoption of zero-emission vehicles (ZEVs). The association highlighted that mandatory measures fail to account for the diverse operational realities and financial constraints of logistics operators. Instead, CLECAT called for robust financial incentives, improved charging/refuelling infrastructure, and coordinated strategies to support the sector's transition to ZEVs.

CLECAT also participated to the various studies engaged by the Commission on the readiness of the market for the uptake of alternative fuel HDVs, through stakeholder interviews and surveys. These studies for which the results are expected in 2025 will help the Commission shaping the future policies to help decarbonise trucking, including the revision of the CO_2 standards for heavy-duty vehicles and the Alternative Fuels Infrastructure Regulation (AFIR).

Revision of the Driving License Directive

CLECAT considers the ongoing revision of the Driving Licence Directive one of the key solutions to alleviate the shortage of professional drivers, which is set to widen due to increased transport demand, as well as an ageing truck driver population. CLECAT supported the Commission proposal which would allow early training from 17-year-old to enhance driver access to the industry, reduce administrative burden on applying/renewing (professional) driving licences and recognising third country licenses, as well as allowing B-licence holders to drive alternatively fuelled trucks up to 4.25

tonnes. As negotiations between Parliament and Council started in October 2024, CLECAT will continue to advocate for these important measures and to raise awareness to policymakers on the consequences of the shortage of drivers on the EU logistics supply chain.

Implementation of new road freight social rules

CLECAT continue to help its members implementing the new social rules stemming from the adoption of the Mobility Package I in 2020. We welcomed the [decision](#) of Court of Justice of the EU annulling the rule on the return of the vehicle, which was undermining the efficiency of road logistics operations with increased empty journeys and emissions.

CLECAT participated to the meetings of the EC Expert Group on posting of drivers and provided input to the ongoing evaluation of the Mobility Package rules. CLECAT continued its engagement with the Commission and stakeholders, notably inviting the Commission to reflect on [recommendations](#) for a better implementation and enforcement of the Package.

Eurovignette Directive Implementation

CLECAT monitored the implementation of the Eurovignette Directive, focusing on its fair and consistent application across Member States. CLECAT provided its members with comprehensive guidance to adapt to national changes in road toll structures, ensuring they remained compliant while maintaining competitiveness in the market.

Promoting Digital Transport & Logistics

Facilitation of electronically submitted transport information

Considering the importance and opportunities relating to the digital exchange of data in the logistics industry, including digitalisation or even automation of administrative processes, CLECAT continued its work on promoting the harmonisation of data, IT systems and interfaces across various legislative fields and authorities. Whilst digitalisation is optimising processes and creating many business opportunities, cyber risks are equally increasing. Ensuring data protection and privacy while maintaining accessibility and affordability is of paramount importance, therefore significant work is being undertaken to create the right balance between easy and affordable solutions.

In 2024, CLECAT continued its active participation in the new Digital Transport and Logistics Forum (DTLF), a key initiative established by the European Commission to drive the digital transformation of the transport and logistics sectors. The DTLF serves as a collaborative platform for public and private stakeholders to promote interoperability, efficiency, and seamless data exchange in supply chains.

In July CLECAT took part in the DTLF welcome meeting during which the Commission highlighted the Forum's critical role in aligning Member States, the Commission, and trade experts to coordinate transport digitalization efforts, including the implementation of the Electronic Freight Transport Information (eFTI) Regulation. In October, CLECAT participated in the first Plenary Meeting of the renewed DTLF in Brussels bringing together stakeholders from across Europe to discuss advancements in paperless transport, federated data sharing platforms, and the alignment of eFTI with broader EU policies like the European Mobility Data Space (EMDS). CLECAT actively contributed to breakout sessions focusing on these priorities, emphasizing the role of freight forwarders in enabling digitalization while maintaining supply chain visibility and efficiency.

Additionally, CLECAT joined the first yearly conference of the eFTI4EU project, held in October which facilitated dialogue among experts and implementers of the eFTI regulation, fostering collective progress toward shared digital transformation goals in logistics.

As the Forum progresses into its next phase, CLECAT will continue to contribute its expertise to ensure the effective implementation of digital solutions that benefit the logistics sector and EU trade.

Maritime Transport at times of crisis

Addressing the Red Sea Crisis

The Red Sea crisis has severely disrupted global shipping routes, forcing vessels to reroute around the Cape of Good Hope, increasing costs and operational difficulties. CLECAT actively engaged with the European Commission and industry stakeholders to address the operational and financial impacts of this crisis. By participating in maritime security discussions, such as the SAGMAS meetings, CLECAT maintained a direct communication line between freight forwarders and authorities' coordinated responses, including the EU's ASPIDES mission to safeguard maritime traffic.

CLECAT called for transparency in the imposition of crisis-related surcharges and advocated for measures to reduce the financial strain on freight forwarders and shippers. Regular updates provided members with insights into the evolving situation and the EU's efforts to mitigate its impact on supply chains.

Decarbonisation and ETS Maritime

CLECAT continued its advocacy on maritime decarbonisation, focusing on the fair implementation of the EU Emissions Trading System (ETS) for maritime transport. The association co-signed joint letters and issued to the European Commission raising concerns about carbon leakage and the risk of carriers exploiting ETS surcharges for profit. CLECAT also provided feedback to the Commission's monitoring

exercise on the risks of evasion from EU ports, raising concerns over the potential effects of the new shipping alliances coming into effect in 2025.

Transparency is essential for building trust and ensuring the fair distribution of decarbonisation costs. CLECAT has highlighted the importance of clear reporting on emissions and the costs associated with climate measures like ETS and FuelEU Maritime. Transparent environmental surcharges must reflect genuine decarbonisation investments rather than serving as a profit mechanism for carriers. Without such clarity, businesses face difficulties in calculating their Scope 3 emissions and making informed decisions to reduce their environmental impact.

Through its engagement with DG CLIMA, CLECAT also pushed for global solutions to effectively decarbonise maritime transports, promoting international market-based measures at the IMO to complement EU initiatives. These efforts aim to prevent traffic diversion and ensure that the maritime sector contributes meaningfully to emissions reduction.

Maritime State Aid and Tonnage Tax

In 2024, CLECAT continued to advocate for a review of the EU Maritime State Aid Guidelines and tonnage tax schemes. We highlighted the need to unbundle activities eligible for favorable tax treatment to ensure fair competition between vertically integrated carriers and independent logistics operators. CLECAT also supported aligning these guidelines with OECD BEPS 2 rules and the [EU Directive](#) implementing the global minimum corporate tax, to promote fair taxation practices while maintaining the EU's competitiveness.

Detention and Demurrage Practices

CLECAT engaged in extensive discussions on detention and demurrage practices, advocating for EU-level guidelines to ensure consistency and fairness. By analysing best practices from other regions, including the implementation of the OSRA by the US Federal Maritime Commission, CLECAT proposed measures to improve transparency and accountability in the application of charges. These efforts aim to improve the efficiency of the maritime supply chain, support modal shift and reduce the financial burden on forwarders and shippers.

Through these activities, CLECAT reaffirmed its commitment to fostering a transparent, sustainable, and competitive maritime transport sector, ensuring that decarbonisation goals are met without compromising the efficiency and fairness of global trade.
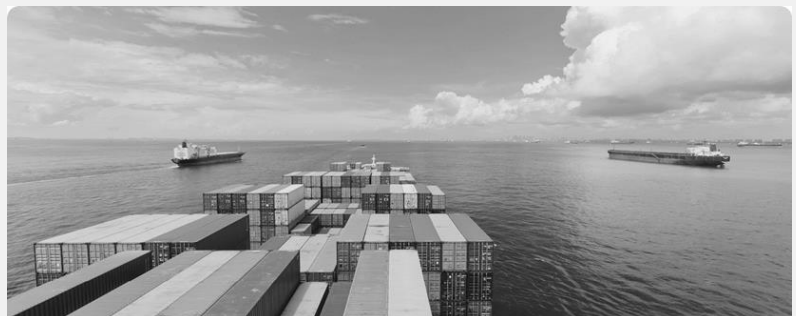
Logistics for Europe: Driving Collaboration for Resilient and Sustainable Supply Chains

On 19 November 2024, CLECAT and the European Shippers' Council (ESC) hosted the third **Logistics for Europe conference** in Brussels, bringing together stakeholders from across the logistics and freight sectors. The event focused on key challenges and opportunities for European supply chains, emphasizing the importance of collaboration, innovation, and regulatory pragmatism to build resilience and sustainability.

Discussions at the conference highlighted the need for robust supply chains capable of addressing disruptions caused by geopolitical tensions, climate change, and economic pressures. Participants stressed the importance of advancing digital transformation to enhance agility and competitiveness, particularly for SMEs, while reducing administrative burdens. The conference also explored strategies for aligning EU regulations with operational realities to support sustainable growth.

This event reaffirmed CLECAT's commitment to fostering dialogue between policymakers and stakeholders with the aim to advocate for policies that strengthen European supply chains. By focusing on collaboration and innovation, CLECAT continues to play a pivotal role in shaping a resilient and competitive future for the logistics sector.