



Joint statement by the private sector of Antwerp (Alfaport), Rotterdam (Deltalinqs) and Hamburg (UVHH) on the request for information (RFI) of the European (EU) Ports strategy

26 July. 2025

Executive summary

The ports of Antwerp, Rotterdam and Hamburg play a pivotal role in the economic and societal development of their region. As critical infrastructure they are gateways that flourish in the context of international free trade and (geopolitical) stability. They attract international investments, create jobs and contribute to the strategic autonomy of Europe.

Alfaport, Deltalinqs and the Unternehmensverband Hafen Hamburg – the umbrella organizations of the private sector in respectively the ports of Antwerp, Rotterdam and Hamburg - are happy to contribute to this RFI and believe that it comes at a critical timeframe. Industries in the ports are under stress and the closure of industrial plants or cutting-down productions and investments in both industry and logistics in the ports, is a reality.

Because of the specific nature of our ports - large logistic-industrial complexes in a densely populated area - we call for a tailor-made approach. We do not believe that a 'one size fits all' approach for EU-ports is the right one. We do not call for new legislation but prefer that the EU Ports Strategy focuses on the execution of the existing long-term plans but is far more agile to adjust these existing plans. This to help the companies in our ports in still making a necessary transition without in the meantime becoming uncompetitive on a global scale because of a disturbed and unfair level playing field.

1. Competitiveness of ports.

Focusing on infrastructure, energy, permitting procedures and the creation of a level playing field should be at the center of attention in any exercise on EU Ports Strategy.

Investments in maintenance but also in newbuild infrastructure should remain at a high level. We therefore urge continuous investments in the TEN – T and TEN – E network also taking into account the potential dual use of these infrastructures to strengthen the strategic autonomy and safety of Europe.

The abundance of cheap low-taxed energy in other parts of the world and the strict steering of the (necessary) energy transition in Europe is harming the competitive position of the industrial-logistic cluster in the ports of Antwerp, Rotterdam and Hamburg. The European Commission should be better aware of this and be more open to the different paths to energy-transition and make the step to emission-free energy more affordable and feasible. It is crucial that the European Commission stimulates investments in a substantial increase of the capacity of the energy grid both on national and European level.

Uncertain, lengthy and red-taped permitting procedures have become a real bottleneck for further investments in our ports. Next to national legislation some parts of the European framework like for instance the habitat directive and the water framework directive make it very difficult/unfeasible to get the necessary permits despite all – demonstrable – efforts by the companies. We need adjustments to these frameworks in the form of a more tailor-made, area-specific approach also taking into account the location of our ports in the densely populated, industrial heartland of Europe.

While facing enormous investment challenges in the context of climate change, energy transition, resilience, military mobility and competition from other regions that receive strong state support, the sea port industry in Europe does not benefit from an own legal framework for state aid. The EU Port Strategy should therefore include an effective EU Framework on state aid for ports that can be used by member states to strengthen the competitiveness of the EU's globally active port sector.

2. Resilient and secure ports for a competitive and reliable EU Port System.

Seaports are part of Europe's critical infrastructure, should be safe and resilient and hence need to be well protected. This is even more pressing in the current geopolitical context. Integrity and secure operations are essential to the stability of both our economic and social structures. A robust European foreign trade and security policy is key.

Drug-related crime has been a threat for years now in the ports of Antwerp, Rotterdam and more recently also Hamburg. The infiltration of criminal drug-networks in our ports and communities poses risks to the business-environment but also threatens the physical integrity of staff. Both on community and company level the private sector in the ports of Antwerp, Rotterdam and Hamburg has invested in fencing, better access control, secured data transfer and raising awareness. We have seen that a close public-private partnership is very effective. Corruption, recruitment of insiders and infiltration by criminal organizations are a reality both in the public and private sector and are better addressed jointly. We urge the European Commission to build further upon the European Ports Alliance but stress the importance of continuous involvement from the private sector in this alliance. The European Commission could also support private investments in (technological) innovation on security standards, access control systems, resilience training. The European Commission should also promote more active exchange of information and best practices within the EU and other countries e.g. the Americas.

More than ever it is crucial to identify and strengthen critical port processes against potential geopolitical disruptions. Having alternatives in place for long-term power or data outages because of physical and digital attacks, is no longer a 'nice to have' but an absolute minimum 'must have'. This requires an integrated approach with public-private cooperation.

The ports of Antwerp, Rotterdam and Hamburg already play a crucial role in the deployment of domestic and foreign troops in the ongoing build-up of military capacity in Europe. The necessary use of private infrastructure necessitates a clear set of rules including financial arrangements to make this public-private partnership robust and sustainable. We urge the European Commission to increase investments in dual-use cross-border infrastructure, essential for the military mobility via our ports.

Introduction | Ports as strategic gateways to the world

Ports have always played a pivotal role in the economic and societal development of the world. They were and still are the gateways for trade and form the lifeline of a region with the rest of the world. They flourish in the context of international free trade and geopolitical stability. They attract international investments, create jobs and contribute to the strategic autonomy of a region.

This is particularly the case for the ports of Antwerp, Rotterdam and Hamburg, all three active on a global stage and crucial for the economic development of the North-western part of Europe and beyond. These ports play in the champions league of global container ports but are also crucial for the throughput of dry, liquid and breakbulk. Set up originally as gateways for the throughput of goods, these three ports have evolved into industrial clusters where industrial production and logistics are interwoven and are strengthening one another. No logistics without industry. No industry without logistics.

As large port-industry clusters the ports of Antwerp, Rotterdam and Hamburg are to be considered as **critical infrastructure, crucial for the strategic economy of the region and Europe.** Therefore we urge that these ports and their logistic and industrial activities be approached in a way that they can keep up and even strengthen this role for the benefit of local economic development, as a center of employment contributing to the welfare state and also in guaranteeing the strategic autonomy of the European Union.

The **umbrella organizations of the private sector in the ports of Antwerp, Rotterdam and Hamburg, respectively Alfaport, Deltalinqs and UVHH** are happy to contribute to the RFI on EU Ports strategy launched by the Commission end of June 2025. Despite the very strict deadline of July 28th, we edited this cover statement in which we focus on a few themes that are crucial for the future prosperous development of the ports of Antwerp, Rotterdam and Hamburg.

We stress the **critical timeframe** during which this RFI is launched. Industries in the ports are under stress and the closure of industrial plants or significant production cut-downs are a reality. Big investments in both industry and logistics are put on hold. **Energy-cost, issues with capacity of the grid and difficult permitting procedures are – amongst other elements like labor-cost and flexibility of labor - becoming structural handicaps for both the logistic and industrial companies active in our ports.** The solution to this is not new legislation! It is far more preferable that the EU Ports Strategy **focuses on the execution of the existing long-term plans such as the Green Deal and the Industrial Deal but is also agile enough to adjust these existing plans.** This to help the existing companies in our ports in still making this transition without in the meantime becoming uncompetitive on a global scale because of a disturbed and unfair level playing field.

Because of the specific nature of our ports - large logistical-industrial complexes in a densely populated area - we call for a more tailor-made approach. We do not believe that a 'one size fits all' approach for EU-ports is the right one. Instead, a tailor-made approach, acknowledging the specifics of these ports is more effective.

With this joint statement we reach out to the European Commission for a further dialogue on this with specific attention for the following themes.

1. Competitiveness of ports.

Infrastructure

Both public (e.g. roads, locks, bridges... et cetera) and private (superstructure like offices, terminal equipment, industry plants, et cetera) infrastructure in the ports and from and to the hinterland is to be considered as strategic. This goes for road transport, inland navigation, rail and pipelines.

It is crucial that investments in maintenance but also in newbuild infrastructure remain at a high level and this by both the national and the European level. We therefore urge the Commission to continue the investments in the TEN-T network, crucial for the connections between the ports and the hinterland. Strengthening the interconnection between the ports and the hinterland will add to the economic development of these hinterlands.

Because of the geopolitical instability, the crucial role of our ports in military mobility is coming back to the forefront. It is therefore advised that the investment in the TEN-T network and the prioritization of these projects is done taking into account the potential dual-use of some of these connections. The TEN-T network should support the rapid deployment of military capacity where needed. Also the role of the TEN-T and TEN-E network in order to ensure the security of supply of energy and essential freight (food, medicine) should not be neglected.

Energy

Abundant and affordable energy is essential for both industrial and logistic activities in our ports. For the logistic companies (stevedoring, warehousing, shipping), energy is fuel for their energy-intensive activities. For the industrial companies, energy is both fuel as well as a feed stock (base product for further steps in the production process).

Climate change and the need for a global, comprehensive approach to tackle global warming has led to ambitious international climate agreements. The European Union has been a front-runner in this and has translated these international climate agreements into binding legislation.

Ports (both the logistics and industrial clusters) have contributed considerably to meeting the objectives of these international and European agreements. Companies (both industrial and logistic) in the ports are switching to more sustainable energy sources but are currently confronted with uncertainty and a disturbed level playing field in the world. This is leading to higher costs of production in Europe and loss of competitiveness.

To tackle all this, a few issues are to be taken into account: the reality of phased transition with small(er) intermediate steps towards the final objective; the need for a fair level playing field and a robust, cross-connected energy grid in Europe.

Many ways lead to Rome and this is definitely the case for the energy transition. Technological neutrality should be the cornerstone of European legislation and initiatives to support the transition from fossil fuels to more sustainable fuels. This means that the European Commission, followed by the member states should be open to the different paths to energy transition and should not steer in just one direction or to just one alternative. It should be clear that this transition will happen in smaller steps. Both the European level and the national authorities should focus on setting the final objective but should be open to intermediate steps that will reduce emissions and make the step to emission-free energy affordable and feasible. This requires investment funds for the

necessary port infrastructure for all applicable energy sources and raw materials (e.g., for CO₂-free steel production) and create attractive legal framework conditions for the use of alternative energy sources (e.g. a subsidy program for port vehicles with alternative drive systems should be launched).

While the companies in our ports are adapting to the European framework, their competitors in other parts of the world are less likely to do so and have access to abundant, cheap energy. This leads to unfair competition for companies in Europe. High taxation on energy (also sustainable energy) leads to a competitive disadvantage for the companies we represent. The European Commission should face this and look for ways of lowering the energy taxes.

As a final area of concern we would like to point out the capacity of the energy-grid both locally but also on a European level. It is now clear that the energy transition calls for a robust, redundant energy-grid. Both on the national level and the European level this energy-grid is not ready for this transition. It is therefore crucial that the European Commission actively stimulates investments in a substantial capacity increase of the energy grid and thereby assists the member states. Investments in cross-border energy-infrastructure will lead to more resilient port and industry clusters.

Permitting procedures

Uncertain, lengthy and red-taped permitting procedures have become a real bottleneck for further industrial and logistic development in our ports. This often concerns innovation and sustainability projects. This not only leads to frustration and incomprehension among (foreign) investors, it also leads to companies investing elsewhere because of these lengthy, uncertain procedures. This goes for companies already active in our ports and being critical whether to file for new permits or renewal of existing permits but also to international companies that are considering investments in our ports but are reluctant to do so because of the uncertainty of the outcome. As we all know, one of the important negative effects of investing elsewhere (which means outside the EU) is the growing dependency of the EU from other parts in the world. The risk is that there will be less investment in innovation and sustainability, causing us to fall behind in Europe.

Although the granting of permits is a local and/or national authority, parts of the European framework do have an important impact on these permitting procedures and are part of the uncertainty and sky-high obstacles of getting such a permit. Our members, private investors in the ports of Antwerp, Rotterdam and Hamburg, are confronted with European legislation on for instance the habitat directive and the water framework directive that jeopardize their current and future activities. Investments that will lead to a lower emission on the mid long term are being blocked because they may lead to a temporary increase of emissions during the construction phase. This leads to a standstill.

It should be clear that the ports of Antwerp, Rotterdam and Hamburg all are active in a densely populated, industrialized area. The presence of the ports has led to prosperity for the local city or municipality and broader region. The future is however endangered if we do not succeed in adjusting these European frameworks to the local situation, taking into account the strong efforts already being made by the private sector to contribute to a more sustainable port cluster. Effects of emissions also do not stop at the city- or even country-border. Historical pollution is a fact of life and a consequence of centuries of economic development in our ports.

It is therefore essential that we adapt a more area-specific approach taking into account the densely populated, industrial area in which ports are active. For instance, European legislation on habitat directive does have a different impact depending on the location. It is therefore crucial that the European Commission steps away from a 'one size fits all' approach to a more tailor-made, area-specific approach. While establishing such an area-specific approach, temporary exemptions from these directives will be crucial for safeguarding the existing activities in our ports.

As an example we refer to the Water Framework Directive. The recently published EU Environment Report on the implementation of EU environmental law shows that full compliance with the objectives of the Water Framework Directive will not be achieved by 2027 with the program of measures set out in the third management plans. The time frames set out in the Water Framework Directive must therefore be adjusted, as otherwise considerable legal uncertainty will arise from 2027 onwards. The actual conditions on many waterways are extremely difficult and often require technically complex (individual) solutions. The planning and approval processes for large water bodies, with their diverse and overlapping interests and usage requirements, are complex and lengthy. In view of the considerable efforts involved in water protection, the EU Water Framework Directive should provide for at least one additional management period beyond 2027 to improve water quality.

Ports are also ideally suited to implement experimental or low-regulation zones but EU legislation does not currently allow this.

Level playing field – extra financial stimulus for transition in Ports.

The EU must advocate free trade with all economic regions, investment in European networks, and the definition of essential areas of protection. This includes the EU backing its own strategic approaches with adequate financial resources. Foreign direct investment and partnerships must be possible.

While all other transport sectors benefit from their own legal framework for state aid with extensions, seaports remain the only major transport sector that is neither covered by the existing state aid guidelines nor included in any of the current reforms.

This while the seaport industry faces enormous investment challenges in the context of climate change, the energy transition, resilience, military mobility, and fierce competition from non-EU and EU companies that receive very strong and competition-distorting state support. Significant investments are needed in areas such as electric cranes, low-emission handling equipment, automated systems, infrastructure for alternative fuels, and IT tools, none of which fall within the scope of the current General Block Exemption Regulation (GBER). The Maritime Guidelines, which date back to 1996, favour shipowners unilaterally (tonnage tax, General Block Exemption Regulation/GBER). The Maritime Guidelines therefore need to be revised.

The EU Port Strategy should therefore include an effective EU framework on state aid for ports, listing and expanding all financing mechanisms, compensation measures, and state aid schemes that can be used by Member States to strengthen the competitiveness of the EU's globally active port sector.

The seaport industry therefore needs a two-pronged regulatory approach:

1. A specific instrument for the exemption of state aid (General Block Exemption Regulation).
2. Supplementary guidelines for state aid to seaports to define both eligibility criteria that go beyond the aid exempted from the notification requirement and the legal framework and strategic use of public support.

2. Resilient and Secure Ports for a Competitive and Reliable EU Port System

A safe and resilient port—capable of withstanding a wide range of disruptions—is a fundamental condition for the smooth handling of maritime traffic and for maintaining a reliable and competitive port and industrial complex. Due to their strong overseas and hinterland connections, our seaports are of strategic importance for Europe’s supply chains, autonomy, safety and security.

Seaports are part of Europe’s critical infrastructure and must therefore be well protected. This need is even more pressing in the current geopolitical context. Integrity and secure operations are essential to the stability of both our economic and social structures. The handling of critical infrastructure must take into account the entire transport chain and be embedded in a robust European foreign trade and security policy.

The selection of technology providers should be left to companies, as otherwise there is a risk that the choice of providers will be restricted for political reasons. The public sector should provide the business community with well-founded information on questionable technology only.

We are in need of a European Strategy to protect Ports against espionage (especially through drones) and sabotage.

Tackling Subversive Crime

Drug-related crime—particularly infiltration by criminal organizations—has posed a persistent and growing threat for years now in the ports of Antwerp and Rotterdam. In more recent years we have also seen a significant increase in number of drug related seizures in the port of Hamburg. Through international cooperation with source and transit countries, we see the severe impact that globally operating drug networks have on the stability of societies and the well-being of citizens. These networks also pose significant risks to businesses operating within or connected to the port logistics chain and the physical integrity of their staff

The ports of Antwerp, Rotterdam and Hamburg are the biggest EU-hubs for South-American cargo. This legal trade in for instance fruits and agricultural products has unfortunately also attracted illegal trade like drug smuggling (cocaine). The number of tons of cocaine being seized by police and customs has increased in a spectacular way.

The fight against drug-related crime must encompass the entire transport chain and, above all, start at the places of origin of drugs or where they are produced and consumed. In particular, security authorities need to be better equipped with personnel and (technical) equipment.

In an effort both on community and company level, the private port sector in our ports has invested significantly in fencing, better access control, secured data transfer within the supply chain and also raising awareness of the staff at terminals, warehouses but also shipping agents, forwarders etc. These and other measures taken by the national governments have led to a recent decrease of drug seizures in the ports of Antwerp and Rotterdam but because of the waterbed effect an increase in other European ports. We must therefore remain vigilant.

In the ports of Antwerp, Rotterdam and Hamburg, strengthening public-private cooperation within our ports has been the cornerstone of our strategy. It is vital that public and private actors build strong relationships and exchange information in a climate of mutual trust and equality—recognizing their shared responsibilities. Issues such as corruption, recruitment of insiders, and infiltration by criminal actors are not solely public or private matters, but shared risks that must be addressed jointly.

This requires the implementation of common barriers. Such barriers can be embedded within company processes—spanning IT, operational workflows, and human resource management (HRM). Enhancing IT systems and work processes often requires physical or digital technical solutions. HRM, in contrast, focuses on fostering a culture of integrity, open dialogue, training, and attention to human behavior. These areas are naturally interconnected: For instance, limiting the circle of individuals with access to highly sensitive information, applying the four-eyes principle in critical decision-making, and personnel screening all require solutions that address both system-level safeguards and human behavior.

We advocate for joint action across the following areas:

- Build further upon the European Ports Alliance in a coordinated effort to fight crime and especially drug related criminality within the ports. A strong public private partnership and continuous involvement from the private sector is crucial.
- Make public-private collaboration based on trust and shared responsibility the norm across the EU.
- Roll out technically innovative security standards—such as ‘security by design’ and advanced access control systems at high-risk terminals—based on screening and integrity protocols as has become standard practice in the ports of Antwerp, Rotterdam and Hamburg.
- Provide resilience training, for example using simulation actors (Rotterdam) or via specialized web platforms like www.onzehavendrugsvrij.be (Antwerp) or joint specialized trainings with investigative authorities (Hamburg) , to equip port employees with the skills to resist recruitment attempts by criminal organizations.
- Ensure effective exchange of information and best practices within the EU and internationally, to better respond to the evolving tactics of organized crime. For a level playing field and effective enforcement, all potential transit ports must invest in the fight against subversive crime.
- Promote societal awareness—particularly regarding the consequences of consumer behavior—through targeted education and campaigns.
- Roll out effective protecting measures for the witnesses of illegal activities in ports (like the employees of port companies, e.g. dockers and mooring or lashing people witnessing drugs runners).

Cyber Resilience

Cyberattacks may originate from criminal motives, from acts of sabotage or state actors. To enhance the resilience of our ports, we must invest in innovations in detection systems, artificial intelligence, protection against (large-scale) digital disruptions and awareness. Sharing and applying these technologies, supported by aligned legislation, is essential.

Advanced digitization allows transport chains to be transparent for authorized actors, and ensures that identities are easily verifiable and access is strictly regulated. Data exchange must take place via clear agreements and secure protocols, ensuring that relevant information is available to chain partners in a timely and secure manner—without exposing it to unauthorized access.

Geopolitical Resilience

In addition to the measures mentioned above, it is crucial to identify and strengthen critical port processes against potential geopolitical disruptions—again, through close public-private collaboration. Having alternatives in place for long-term power or data outages (because of physical and/or digital threats) is no longer optional, but essential. This requires an integrated approach, with close coordination between governments, industry, and society at large.

At the European level, we should aim to learn from best practices and draw lessons from countries and ports that have already made significant progress in this domain.

The ports of Antwerp, Rotterdam and Hamburg will - most likely - play a crucial role in the rapid deployment of domestic and foreign troops in the ongoing build-up of military capacity in mainland Europe. Return 'logistics' of these troops and their accompanying heavy equipment will also transit via these ports.

Public-private partnership will be paramount to make this happen. Because of the size of operations and volumes involved dedicated military docking capacity will be largely insufficient. A close cooperation with the private sector will therefore be absolutely essential. In the realignment of European defence policy, clear rules must be established for the use of private terminals for military purposes: financial support must be provided for dual use-ports. This also applies, for example, if areas cannot be used adequately due to dual use (e.g., no or only limited development of the areas, etc.).

The European commission should further strengthen the military mobility via the ports of Antwerp, Rotterdam and Hamburg by European investments in the Ten-T network and thereby prioritize dual use infrastructures like cross-border highways, railways and swift and rapid customs procedures in order to create fast corridors between our ports and the zones of conflict or troop deployment.

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