

Introduction

2025 will be a key year for the European Union (EU). Following the 2024 European Parliament (EP) elections, a new European Commission (EC) took office on December 1, 2024. The new EC's early policy output is expected in the first quarter of 2025. Furthermore, laws and policies adopted during the 2019-2024 legislature will continue their entry into force in 2025 and beyond.

In the year ahead, shipping companies operating in and out of the EU should account for policies under development or scheduled to enter into force. Here are 10 of the most important ones, which we will be closely following for clients:

1. Sustainable Transport Investment Plan

The new EC has [announced the development](#) of a Sustainable Transport Investment Plan to prioritize and scale decarbonization investments in transport. The Sustainable Transport Investment Plan should identify measures to support the transport energy transition and increase investment in sustainable fuels, particularly in the maritime and aviation sectors. It will be embedded in the [Clean Industrial Deal](#), a flagship EC policy to support industry decarbonization, growth and competitiveness.

As of yet, details on the Sustainable Transport Investment Plan and the Clean Industrial Deal are scarce, but the impact on the shipping industry will likely be considerable. Nevertheless, the new EC is expected to announce further information in the coming weeks. Concrete plans for the Clean Industrial Deal are expected by March 11, 2025.

2. Industrial Maritime Strategy

The new EC has also announced an industrial maritime strategy as part of the Clean Industrial Deal. The strategy will be aimed at maintaining the EU's "industrial edge" by enhancing the competitiveness, sustainability and resilience of the EU's maritime manufacturing sector. Further details are expected over the coming weeks and months. From our perspective, this is a key opportunity for the EU maritime industry as the EU is aiming to heavily invest in its global competitiveness.

3. EU Port Strategy

The EC wishes to enact an EU Port Strategy to look at issues facing ports, such as security, competitiveness and sustainability. It is understood that the strategy will build on the European Ports Alliance anti-drug trafficking and organized crime platform launched in 2024.



4. Global Gateway

The EU [continues work](#) on Global Gateway, a strategy to encourage EU public and private investment in infrastructure (including ports), transport, digital and green energy projects worldwide.

Global Gateway aims to raise up to €300 billion in investment by 2027. Its geographical focus is mainly Africa, as well as the Western Balkans, Ukraine, Asia, Latin America and the Caribbean.

For the new legislature, EC Vice President and Foreign Affairs and Security Policy High Representative Kaja Kallas has indicated that Global Gateway will seek synergies with trade and macroeconomic measures, including through "integrated packages". As Global Gateway passes the halfway mark of its initial agenda, 2025 should offer the insights into the future of the initiative.

5. Customs, Rules of Origin and Tariff Schedules Reform

An updated EU Customs Code is [expected to be published](#) during the first quarter of 2025. The entry into force of most of its provisions is expected in 2026, with some provisions delayed until 2027 and 2028.

Amendments include a new approach to e-commerce and simplified procedures for preapproved importers. The reformed Customs Code also provides for a new IT platform for customs authorities. It will be overseen by a new EU Customs Authority.

Looking forward, the EC has [announced](#) an evaluation of EU rules of origin, and autonomous tariff suspensions and quotas, during the 2025-2029 legislature.

Finally, the EU wishes to play a leading role in the implementation of the World Customs Organization's (WCO) Green Customs Plan, as well as in the 2027 edition of its Harmonized System (HS) product nomenclature. The size of the EU's single market and the EC's expertise mean that the EU may be influential in both processes.

6. Carbon Border Adjustment Mechanism (CBAM)

[CBAM](#) is a new regime covering EU imports of certain products (electricity, iron and steel, cement, aluminum, fertilizers and hydrogen). Its transitional phase started in October 2023. Several changes will apply as of January 1, 2025. Two may be of particular interest to the shipping industry.

First, importers or their indirect customs representative will have to apply for “authorized CBAM declarant” status prior to importing covered goods into the EU. Noteworthy, authorized CBAM declarant status will be required from January 1, 2026, when CBAM will enter its definitive phase.

Second, reporting companies will have to use the “EU method” of reporting, which, inter alia, sets rules on the method to be used to determine the emissions embedded in complex goods.

Shipping industry players should ensure that they comply with any new CBAM-related obligations they may be bound by from January 1, 2025, (including in any role, for example, as customs representative for clients). Verifying clients’ CBAM compliance may also be advisable to ensure smooth operations from January onwards.

In 2025, the EC will also present a CBAM review report. The report will include an assessment of possible extensions of the CBAM’s scope, including to indirect emissions. The EC will also consider including products further down the value chain of the current CBAM goods.

Further insights are available in this [article from our team](#) concerning the operation of CBAM.

7. The Corporate Sustainability Reporting Directive

The [CSRD](#) requires in-scope companies to disclose social and environmental impacts by following the EU’s sustainability standards.

In 2025, companies and parent companies of groups with 500 employees or more and that are public-interest entities within the meaning of Article 2(1) of [Directive 2013/34/EU](#) will be required to submit their first CSRD-compliant sustainability reports, covering financial years starting on or after January 1, 2024.

Additionally, CSRD-compliant reporting for financial years starting on or after January 1, 2025, will be due in 2026 for large non-EU companies with listed debt or equity on a regulated market in the EU, and for large companies that are not presently subject to the Non-Financial Reporting Directive (with more than 250 employees and/or €50 million in turnover and/or €25 million in total assets.)

This [article from our team](#) offers further insight into CSRD-related challenges.

8. Corporate Sustainability Due Diligence Directive (CSDDD)

Looking beyond immediate 2025 deadlines, the progressive entry into application of the [CSDDD](#) from July 26, 2027, onward is an important development on the horizon. Importantly, CSDDD compliance by 2027 may require complex and time-consuming preparations in advance.

The CSDDD will set new obligations on companies to conduct human rights- and environmental degradation-focused due diligence processes, as well as risk mitigation measures with regards to their own operations and global value chains.

Initially, only EU companies with a global net turnover above €1.5 billion will be subject to CSDDD obligations, as well as non-EU companies with an EU turnover above €1.5 billion. Progressively lower thresholds will apply from 2028 and 2029.

This [article](#) and this [blog \(in French\)](#) from our team offer insights into the impact of the CSDDD on existing French and German laws, and the outlook for companies in those countries.

9. Deforestation Regulation and Regulation Prohibiting Products Made With Forced Labor on the EU Market (Forced Labor Product Ban)

Starting from either December 30, 2024, or, more likely, from December 30, 2025, (depending on last minute EU legislative developments), companies looking to make available on the EU market, or export from it, covered deforestation-inducing commodities (cattle, cocoa, coffee, palm oil, rubber, soya or wood) or certain products made from them will be bound by the [EU Deforestation Regulation](#). They will be required to carry out due diligence and ensure that commodities whose production has generated deforestation, or covered products thereof, are not placed on the EU market or exported from it.

The [EU Forced Labor Product Ban](#) also features upcoming but more distant trade-related obligations. Under the product ban, economic operators will be banned from placing and making available on the EU market, or exporting from it, products made with forced labor.

The official publication of the Forced Labor Product Ban regulation is imminent. Obligations on economic operators will start applying three years after that, i.e., in December 2027 or January 2028.

Transport services are explicitly excluded from the scope of the Forced Labor Product Ban.

Nevertheless, the smooth running of operations may require shipping companies to ensure clients are aware of their obligations under both the EU Deforestation Regulation and the Forced Labor Product Ban and comply with them.

Insights are available from our team on the [Deforestation Regulation](#) and the [Forced Labor Product Ban](#).

10. Sanctions

[Sanctions](#) (also known as restrictive measures) have become an increasingly common foreign and security policy tool. Shipping is more affected than other sectors.

EU sanctions are expected to continue applying, and expanding, in 2025. A 15th package of EU sanctions on Russia is expected by the end of 2024, or in early 2025. A 16th package could follow soon after. As a result of “shadow fleet” clandestine Russia-related shipping operations in, for example, the Baltic Sea, the shipping industry and its service providers (e.g., insurers) are expected to be within the scope of the next rounds of sanctions.

[Analysis](#) has been provided on EU sanctions and Russian countermeasures by our team.

Practical Considerations

Companies across industries, including commodities and shipping, will have to consider how the various ever-changing regulations apply to their businesses and implement adequate internal compliance and monitoring frameworks for efficiency, and to ensure that applicable regulations are not breached. There will also likely be a need to amend contracts, such as ship management agreements, pooling agreements, charterparties and financing documents, to reflect new and/or updated regulations and allocate risks and responsibilities among various stakeholders in a transaction.

How We Can Help

We help clients plan for future policy, adapt to developments and shape EU policy and regulatory measures. We have an industry-leading public policy team in Brussels, which helps clients stay ahead of the curve, and advocate for the necessary changes to proposed EU measures.

We habitually team up with our global maritime law team to deliver high-end EU regulatory, policy, trade and contractual advice. We have deep expertise in shipping, trade and environmental law, and offer practical, commercially focused advice.

Contact Us

For further information or to discuss your requirements and plans, please reach out to our dedicated team.

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