

# State aid in the aviation sector – Commission guidelines on airports and airlines (revision)

Fields marked with \* are mandatory.

## Introduction

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## About you

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### \* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
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- ☐ Dutch
- ☒ English
- ☐ Estonian
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- ☐ Greek
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\* I am giving my contribution as

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- ☐ Business association
- ☐ Company/business
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☒ Public authority
- ☐ Trade union
- ☐ Other

\* First name

Head of

\* Surname

STATE AID UNIT -EZK

\* Email (this won't be published)

\* Scope

- ☐ International
- ☐ Local
- ☒ National
- ☐ Regional

\* Level of governance

- ☐ Parliament
- ☒ Authority
- ☐ Agency

## \* Organisation name

255 character(s) maximum

NL/EZ/ Interdepartementaal Staatssteun Overleg (ISO). The ISO is a central State aid coordination body composed of all Dutch ministries and representatives of the regional and local authorities.

## \* Organisation size

- ☐ Micro (1 to 9 employees)
- ☐ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☒ Large (250 or more)

## Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

## \* Country of origin

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- ☐ Democratic Republic of the Congo
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- ☐ Liberia
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The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

#### ☐ Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

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## Introduction

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The [2014 Guidelines on State aid to airports and airlines](#) (‘the Aviation Guidelines’) offer sector-specific guidance on the notion of aid in the aviation sector and describe the conditions for State aid in the aviation sector to be compatible with the single market.

The Aviation Guidelines were amended in [2018](#) to prolong the specific regime for operating aid to airports with up to 700 000 passengers per year, until 3 April 2024, i.e., until the end of the 10-year transitional period for operating aid to all regional airports contained in the Aviation Guidelines. The Aviation Guidelines were then amended in [2023](#) to prolong the 10-year transitional period for operating aid to all regional

airports by a further 3 years, from 2024 (when it was originally due to expire) until 2027, to cater for the impact of the COVID-19 pandemic.

The aviation sector has evolved significantly since the adoption of the Aviation Guidelines in 2014. The Commission's [Fitness Check of the 2012 State aid modernisation package](#) conducted in 2019-2020 ('the Fitness Check') identified the need to amend the Aviation Guidelines in the medium term, in particular to ensure that they are fully aligned with the objectives set out in the Green Deal.

Against this background, the Commission plans to review the Aviation Guidelines. In doing so, the Commission will also consider, for consistency reasons, the existing options of granting aid to the aviation sector other than under the framework of the Aviation Guidelines. These other options are set out in the following bullet points and, if relevant, also in the individual sections below.

- Airports and airlines may be entrusted with public-service obligations and compensated for these obligations under the State aid rules applying to [services of general economic interest](#) ('the SGEI package').
- The [General Block Exemption Regulation](#) ('GBER') permits operating aid to airports with up to 200 000 passengers a year and investment aid to airports with up to 3 million passengers a year under certain conditions. The GBER also allows under certain conditions investment aid to airports for renewable energy production, energy efficiency or other decarbonisation or depollution projects, up to EUR 30 million per undertaking per project.
- The [Commission's guidelines on State aid for climate, environmental protection and energy](#) ('the CEEAG') allow to grant aid for the greening of the aviation sector under certain conditions.
- The [Commission's Guidelines on State aid for rescuing and restructuring non-financial undertakings in difficulty](#) allow aid to airlines or airports in difficulty under certain conditions.

## A. General – Importance of Regional Airports (1/6)

The Aviation Guidelines recognise that regional airports (airports with an annual passenger traffic volume of up to 3 million) are important for economic growth, territorial cohesion and connectivity, in particular with respect to isolated, remote or peripheral regions of the European Union. The rules on operating aid, investment aid and start-up aid foreseen under the Aviation Guidelines were designed against that specific background and the situation of regional airports in 2014. In light of this:

### 1. To what extent do regional airports contribute to:

	Significantly	Moderately	Marginally	Not at all	I don't know
Regional connectivity	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional economic development	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Combatting traffic congestion of major EU hub airports	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please substantiate your reply.

Regional Connectivity: The Netherlands has a well-developed rail and road network, which reduces the reliance on regional airports for connectivity. However, regional airports provide additional connections to European destinations that are not as conveniently accessible by rail or road.

Regional Economic Development: Regional airports contribute to the local economies through employment, tourism and business activities. For example, Eindhoven Airport is crucial for the Brainport region, Rotterdam The Hague Airport supports tourism and business, while Groningen Airport Eelde and Maastricht Aachen Airport serve the regional demand for air travel.

Reducing congestion at major EU hub airports: Most long-haul flights still depart from Schiphol Amsterdam Airport

## 2. To what extent do regional airports

	Significantly	Moderately	Marginally	Not at all	I don't know
Exercise competitive pressure on major EU hub airports	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Compete with one another with respect to passengers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Compete with one another to attract airlines (e.g., to open a base or with respect to the opening of new routes)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Have an effect on the use of other modes of transport (e.g., high-speed rail)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

### Please substantiate your reply.

Exercise competitive pressure on major EU hub airports: For the Netherlands, Schiphol remains the most important airport for both long-haul and transfer traffic. Regional airports are complementary to the EU hubs and provide more point-to-point traffic rather than hub-and-spoke traffic from the EU hubs. As such, they do not exert significant competitive pressure on major hub airports (such as Schiphol).

Compete with one another with respect to passengers: Regional airports compete with each other for the same type of traffic (and therefore for similar airlines). However, as each regional airport serves the demand of its own region, there is a moderate degree of competition between the regional airports.

Compete with one another to attract airlines: Please see the previous response.

Have an effect on the use of other modes of transport: The rail network reduces the need for regional air transport on (ultra) short haul routes. For medium-haul and longer short-haul flights (e.g. for destinations in Southern and Eastern Europe), flying from regional airports is more efficient and attractive. This makes regional airports an important alternative to international rail transport.



3. After the Aviation Guidelines have been in force now for more than 10 years, are regional airports in the EU overall more cost covering than before?

- ☐ Yes
- ☒ No
- ☐ I don't know

Please substantiate your reply and submit any data/information/study etc. you may have in this regard.

None of the regional airports in the Netherlands with less than 700.000 passengers per year have a positive business case, unless the competent authorities are willing to pay for the services of general interest.

3.1. How can currently still loss-making airports become cost-covering by 2027?

- ☐ Cost-saving / rationalisation measures
- ☒ Attracting new airlines and customers
- ☒ Developing non-aeronautical activities at the airport (e.g., shops, restaurants)
- ☒ Other (please specify)
- ☐ I don't know

Please substantiate your reply and submit any data/information/study etc. you may have in this regard.

Attracting new airlines and customers leads to more direct and indirect revenues for airports, including non-aeronautical activities. In addition, regional airports can play a key role in the research and development of sustainable aviation technologies and create revenue streams in this area.

3.2. What are the common features of unprofitable airports that are unlikely to achieve full operating cost coverage by the end of the transitional period in April 2027?

- ☒ Size (e.g., by numbers of passengers, freight volumes, number of airlines operating at airport)
- ☒ Location of airport (located in Member State with high or low number of unprofitable airports, well-connected or peripheral region, non-touristic or touristic area)
- ☒ Population in catchment area
- ☒ Competition from neighbouring airports or other modes of transport
- ☒ Market conditions (e.g., type of airlines operating at airport and their potential bargaining power)
- ☒ High fixed costs

☐ Other (please specify)

Please substantiate your reply and submit any data/information/study etc. you may have in this regard.

Smaller regional airports with fewer passengers and airlines, located in peripheral or less touristic regions, are more likely to struggle with cost coverage. Other modes of transport, such as good rail and motorway networks, also make it more difficult for them to fully cover their costs. In addition, competition from larger, relatively nearby airports with sparsely populated catchment areas hampers the airport's ability to grow. Furthermore, as mentioned above, regional airports, especially those with fewer passengers per year (i.e. 700,000), tend to have fewer airlines and may be more dependent on a few airlines. This bargaining power of the airlines reduces the potential of airports to earn more on airport fees. Finally, the much smaller size of regional airports means that they have relatively high fixed costs that cannot be spread (over airlines and passengers).

4. Which passenger number (per year) is typically needed for an airport to be able to achieve full operating cost coverage (considering fixed and variable costs and aeronautical and non-aeronautical revenues)?

- ☐ 200 000
- ☐ 500 000
- ☐ 700 000
- ☐ 1 million
- ☐ 1.5 million
- ☐ 2 million
- ☒ Other (please specify)

Please substantiate your reply and submit any data/information/study etc. you may have in this regard.

The Dutch authorities do not have data on this question.

## **B. Operating aid to regional airports (2/6)**

Section 5.1.2 of the 2014 Aviation Guidelines provides that regional airports can, under certain conditions, receive operating aid to cover their operating costs. Since operating aid is generally a very distortive form of aid, the provisions on operating aid apply only for a transitional period until April 2027 (after prolongation of the initial transitional period until April 2024 to cater for the impact of the COVID-19 pandemic), during which airports should adapt to the new market environment (e.g., by introducing rationalisation measures, differentiating their business model or by attracting new airlines and customers).

Under the Aviation Guidelines, airports may receive operating aid to cover their expected "operating funding gap" (operating deficit over the relevant period) as determined in an *ex ante* business plan. This establishes, in a first step, a maximum aid amount. This maximum aid amount is, in a second step, further capped at defined aid intensities in reference to the so-called "initial operating funding gap", meaning the

average operating deficit in the 5 years prior to the entry into force of the Aviation Guidelines (i.e., 2009–2013 as reference period).

Accordingly, and also taking into account the GBER, the extent of compatible operating aid differs depending on an airport's size:

- Airports with an average annual passenger traffic of not more than 200 000 during the two financial years preceding the grant of the aid may receive operating aid and the aid is block exempted under Art. 56a GBER.
- Small airports with an average annual passenger traffic between 200 000 and 700 000 may receive operating aid of up to 80% of the "initial operating funding gap".
- Airports with an average annual passenger traffic between 700 000 and 3 million are eligible for operating aid up to 50% of the "initial operating funding gap".
- Airports exceeding an average annual passenger traffic of 3 million are not eligible for operating aid.

5. Based on your experience, do you think that operating aid as an instrument will still be necessary after the end of the transitional period in 2027?

- ☒ Yes
- ☐ No
- ☐ I don't know

Please substantiate your reply.

Operating aid within the meaning of the Aviation Guidelines is not applied in the Netherlands. However, the possibility to grant operating aid which is in line with the Aviation Guidelines, should it be deemed necessary, is still an important element for regional airports with relatively few passengers. Moreover, the possibility for a public authority to grant operating aid should be maintained in view of the transition to more sustainable aviation.

5.1 Should operating aid as an instrument be maintained only for airports up to a certain level of traffic, and if so, which one?

- ☐ 200 000
- ☐ 500 000
- ☐ 700 000
- ☐ 1 million
- ☐ 2 million
- ☐ 3 million
- ☒ Other (please specify)

Please substantiate your reply and submit any data/information/study etc. you may have in this regard.

At this stage, the current rules should remain as they are (including the associated number of passengers).

5.2. Would a further prolongation of the transitional period **without any other change to the compatibility conditions** be sufficient to address the needs of regional airports?

- ☒ Yes
- ☐ No
- ☐ I don't know

Please substantiate your reply.

A prolongation of the transitional period would be sufficient, as the necessary operating aid can then be provided to the regional airports. However, it is important to note that additional support and incentives for sustainable development and investments in the transition to greener aviation may be needed.

5.2.1. Which duration would be appropriate for a prolongation **without any change to the compatibility conditions**?

- ☐ 3 years, after which regional airports would need to reach full operating cost coverage
- ☐ 5 years, after which regional airports would need to reach full operating cost coverage
- ☐ 10 years, after which regional airports would need to reach full operating cost coverage
- ☒ Indefinite, i.e., regional airports would not be required to reach full operating cost coverage at any time horizon
- ☐ Other (please specify)

Please substantiate your reply.

The current compatibility conditions are appropriate for the granting of operating aid to regional airports. There is therefore no need to amend the compatibility conditions.

5.3. According to the current Aviation Guidelines, small airports (below 700 000 passengers per year) can be granted operating aid with a higher aid intensity of up to 80% of their funding gap. If operating aid is to be continued on a temporary or permanent basis, should there continue to be a special provision for smaller airports that would allow for such an increased maximum aid intensity?

- ☒ Yes
- ☐ No
- ☐ I don't know

Please substantiate your reply.

As regional airports with less than 700,000 passengers per year are not cost-covering, these provisions should be maintained. This is in order to maintain regional connectivity.

5.3.1. Do you consider the current threshold of 700 000 passengers per year and an aid intensity of 80% as appropriate?

- ☒ Yes
- ☐ No
- ☐ I don't know

Please substantiate your reply.

The threshold of 700,000 passengers per year is appropriate, as this is the level at which cost covering is most difficult to achieve. However, it is important to bear in mind that future measures to transition to greener aviation may lead to higher costs, which may require an increase in this threshold.

5.4. Are the operating aid provisions in the Aviation Guidelines sufficiently addressing the specific needs of regional airports in very remote regions of the EU, such as the outermost regions?

- ☐ Yes
- ☐ No
- ☒ I don't know

Please substantiate your reply.

This is not the case for the Netherlands.

6. The overall management of an airport can be considered a service of general economic interest (SGEI) if, without the airport, the area potentially served by the airport would be isolated from the rest of the Union to an extent that would prejudice its social and economic development. In such case, the airport can receive public service compensations to offset its operating losses, which are compatible aid if they meet the conditions of the SGEI package. Do you consider that the SGEI package could provide sufficient ground to Member States to finance the operating costs of regional airports going forward?

- ☐ Yes
- ☐ No
- ☒ I don't know

Please substantiate your reply.

This is not the case for the Netherlands.

6.1. Do you consider that the revised Aviation Guidelines should include more guidance on the application of the SGEI package to airports?

- ☐ Yes
- ☐ No
- ☒ I don't know

Please substantiate your reply.

This is not the case for the Netherlands.

6.2. The airports and air transport services of the outermost regions, being the remotest parts of the European Union, can be considered a SGEI, subject to a case-by-case assessment. Is the SGEI package adequately addressing the specific constraints of the outermost regions, as per Article 349 of the Treaty?

- ☐ Yes
- ☐ No
- ☒ I don't know

Please substantiate your reply.

This is not the case for the Netherlands.

7. Based on your experience, do you consider the provision of Art. 56a GBER, according to which small airports with an average annual passenger traffic of not more than 200 000 per year are block exempted to be effective?

- ☒ Yes
- ☐ No
- ☐ I don't know

Please substantiate your reply.

Article 56a of the GBER has not yet been applied in the Netherlands. However, the amount of 700,000 passengers per year would be a more appropriate threshold, as this is the level at which cost covering is most difficult to achieve.

## **C. Investment aid to airports (3/6)**

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Section 5.1.1 of the Aviation Guidelines currently provides that aid for eligible investments (i.e., investments in infrastructure and equipment, whereby costs for non-aeronautical investments such as parking, hotels and restaurants are excluded from the eligible costs) up to certain maximum permissible aid intensities can be compatible with the internal market. As for operating aid, the possibility to grant investment aid and the aid intensity depend on the size of an airport:

- Airports with an average annual passenger traffic below 1 million may receive investment aid covering up to 75% of the eligible costs.
- Airports with an average annual passenger traffic between 1 million and 3 million may receive investment aid covering up to 50% of the eligible costs.
- Airports with an average annual passenger traffic between 3 million and 5 million may receive investment aid covering up to 25% of the eligible costs.
- Airports with more than 5 million passengers per year may receive investment aid only in very exceptional circumstances (taking into account the magnitude of the investment and the distortions of competition).

Any aid amount is however capped by a second ceiling, the actual funding gap of the investment (determined on the basis of an *ex ante* business plan over the expected lifetime of an investment). The maximum aid amount is thus capped at the lower of these two amounts in order for investment aid to be considered proportionate.

In general terms, when the Aviation Guidelines were introduced, it was expected that private investment would become increasingly widespread over their duration, so that there could potentially be lesser need for investment aid under the revised Aviation Guidelines. In light of this:

8. Do you think that investment aid under the Aviation Guidelines is still necessary?

- ☒ Yes
- ☐ No
- ☐ I don't know

Please substantiate your reply.

Investment aid for infrastructural adjustments is needed to prepare regional airports for the future, including the transition to greener aviation. Infrastructure investments are needed (e.g. related to hydrogen and electric aviation) and this aid is particularly important for smaller airports, which can play a key role in the transition.

8.1. Should investment aid only be allowed for airports whose overall management is considered a service of general economic interest?

- ☐ Yes
- ☒ No
- ☐ I don't know

Please substantiate your reply.

Smaller regional airports are less cost-covering, which means that it is more difficult for them to spread investments among their customers. This means that investment aid is also necessary for airports that are

not considered as services of general economic interest. Moreover, these airports play a key role in the transition to sustainability, which makes the possibility to grant investment aid all the more important.

8.2. Are the current rules on investment aid under the Aviation Guidelines fit for purpose and should be maintained as they are?

- ☒ Yes
- ☐ No
- ☐ I don't know

Please substantiate your reply.

Yes, but the rules should be simplified and their application widened, e.g. by extending the exempted amount of passengers in Article 56a of the GBER.

9. Should the Aviation Guidelines include a specific set of investment aid provisions for regional airports in very remote regions of the EU, such as the outermost regions?

Also considering that for airports in remote regions the above-mentioned aid intensities may be increased by up to 20% for investments into airport infrastructure

- ☐ Yes
- ☐ No
- ☒ I don't know

Please substantiate your reply.

This is not the case for the Netherlands.

## **D. Start-up aid to airlines (4/6)**

In principle, any development of commercial air traffic should be based on a sound business case and be self-sustainable. However, the Aviation Guidelines acknowledge that without proper incentives, airlines might not always be inclined to open new routes, in particular with respect to remote regions and smaller regional airports. In light of this, Section 5.2 of the Aviation Guidelines allows for 'start-up aid' (by subsidising up to 50% of the airport charges for a newly opened route for up to three years) to airlines if it increases the mobility of EU citizens by enhanced connectivity via new routes and the aid facilitates regional development.

Under the current rules, such start-up aid can only be declared compatible if it concerns a new route linking an airport with less than 3 million passengers per year to another airport within the Common European Aviation Area. The airline must present an *ex ante* business plan demonstrating that the route becomes profitable without public funding after three years, otherwise it must provide an irrevocable commitment to operate the route for a period at least equal to the period during which it received start-up aid.

10. Do you think that start-up aid is still necessary?



- ☒ Yes
- ☐ No
- ☐ I don't know

Please substantiate your reply.

Start-up aid can be a useful tool to accelerate the growth of a regional airport. The possibility to grant such aid should be maintained.

10.1. Do you consider the current rules on start-up aid for airlines to be effective?

- ☐ Yes
- ☐ No
- ☒ I don't know

Please substantiate your reply.

The rules have not recently been applied in the Netherlands.

11. Given that the aviation sector is fully and successfully liberalised, do you think that the possibility to assign public service obligations to specific routes under Regulation (EC) No 1008/2008 would be sufficient to address remaining air connectivity issues (i.e., even if start-up aid were to be discontinued)?

- ☒ Yes
- ☐ No
- ☐ I don't know

Please substantiate your reply.

A PSO offers the possibility to subsidize routes, which corresponds to start-up aid for airlines. However, the provision of start-up aid for a short period of time is more easily implemented through the provision of (short term) start-up aid under the Aviation Guidelines rather than through a PSO.

## **E. Greening of aviation (5/6)**

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Air transport is one of the fastest-growing sources of greenhouse gas and pollutant emissions, noise and other climate impacts. Reversing that trend is necessary to meet the objectives of the future [Clean Industrial Deal](#) and the aviation sector faces increasing pressure to reduce its carbon footprint, pollutant emissions and noise. The Fitness Check identified a need to amend the Aviation Guidelines to ensure in particular that they are fully aligned with the objectives set out in the Green Deal. The Aviation Guidelines do not specifically address the need to mitigate the aviation sector's impact on the environment and the climate. Nevertheless, the aviation sector may already benefit from support under the CEEAG in this respect, for example:

- Aid for the retrofitting, refitting and adaptation of aircraft already in use, to substantially improve its environmental performance compared to a comparable alternative widely available on the market, or to allow aircraft to use, or increase the share of, biofuels and synthetic fuels (Section 4.3.1 CEEAG);
- Aid for the acquisition or leasing of new or used aircraft with (i) zero direct (tailpipe) CO<sub>2</sub> emissions or (ii) substantially improved environmental performance vis-à-vis a comparable alternative widely available on the market (Section 4.3.1 CEEAG);
- Aid for the acquisition or leasing of “clean mobile service equipment”, e.g., ground handling equipment if it has zero direct (tailpipe) CO<sub>2</sub> emissions (Section 4.3.1 CEEAG);
- Aid for the construction, installation, upgrade or extension of recharging or refuelling infrastructure, including within airports. This includes recharging or refuelling infrastructure for airport vehicles, clean mobile service equipment as well as clean aircraft (Section 4.3.2 CEEAG).
- Aid for the improvement of the energy and environmental performance of buildings, including airport infrastructure (Section 4.2 CEEAG);
- Aid for renewable energy production, including by airports (Section 4.1 CEEAG);

12. On a scale from 1 (not important) to 5 (very important), how would you rate the importance of the following elements to allow the transition to green aviation?

	1	2	3	4	5
Availability of sustainable aviation fuels on the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Availability of green hydrogen	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Deployment of disruptive and zero-emission aircraft technologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Availability of necessary airport infrastructure (e.g., electric recharging and hydrogen refuelling stations at airports)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Availability of other infrastructure (e.g., infrastructure for the transport and blending of sustainable aviation fuels)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Renewable energy generation at airports	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Consumers' willingness to pay for green air transport services	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please substantiate your reply.

Availability of sustainable aviation fuels on the market: SAF is one of the most important ways to reduce carbon emissions from aviation. It's currently the best solution.

Availability of green hydrogen: `hydrogen is a promising alternative, but the infrastructure and technology are still at a lower TRL compared to SAF. However, the availability of green hydrogen is a prerequisite for the industry to stimulate the development of this technology. If green hydrogen is not available, development of the technology may be delayed.

Deployment of disruptive and zero-emission aircraft technologies: The development of these technologies is critical to achieving the long term goals.

Availability of necessary airport infrastructure: Airports must have the necessary infrastructure to support zero-emission aircraft, if there's no infrastructure - or not even a plan to invest in it-, the development of the

zero-emission aircraft technologies could be delayed.

Availability of other infrastructure: It is important to note that SAF and/or hydrogen can currently be blended and transported to some extent within the existing infrastructure. However, this is not a long-term solution for scaling up. Investments in infrastructure is still required.

Renewable energy generation at airports: Renewable energy generation is important for the transition to sustainable aviation. However, it doesn't have to be done at airports themselves.

Consumers' willingness to pay for green air transport services: This is important, because if there isn't a market, scaling-up will be difficult. However, consumer demand is secondary to the availability and accessibility of sustainable technologies.

13. Do you consider that passengers are willing to pay a 'green premium' for sustainable flights (i.e., a surcharge compared to regular flights, by which airlines would pass on additional costs connected to sustainable flights to consumers)?

- ☒ Yes
- ☐ No
- ☐ I don't know

Please substantiate your reply.

Yes, there are some theoretical studies. In the Netherlands, 42% of the population is in favour of making tickets more expensive in the interest of sustainability ("draagvlakonderzoek luchtvaart").

In the Netherlands there's a study ("draagvlakonderzoek Luchtvaart"), which shows that 74% of the population are in favour of renewing the fleet. In addition 67% of the population is in favor of an SAF obligation for airlines. There is also a strong support (62%) for the development of hydrogen and electric flights. At the same time, 55% of the people want to make flying with these technologies cheaper. More research is needed on passenger's willingness to pay a green premium.

However, it is still unclear whether people are actually willing to pay more in practice.

Link: Luchtvaart in Nederland - Draagvlakmeting onder het Nederlands publiek, meting 2024 | Rapport | <https://www.rijksoverheid.nl/documenten/rapporten/2025/01/27/bijlage-draagvlak-luchtvaart-6-meting>

13.1. Considering the different costs and availability of such technologies, for which technologies would airlines (who would then pass on such costs to customers partially or fully) be willing to pay such 'green premium'?

- ☒ Sustainable aviation fuels
- ☐ Disruptive and zero emission aircraft technologies
- ☒ Fleet renewal with "best-in-class" conventional aircraft operating on sustainable aviation fuels

Please substantiate your reply and submit any data/information/study etc you may have in this regard.

For airlines, it's important to have a solid business case. With SAF, there is already a mandate, so airlines have to invest in this technology. For fleet renewal, the business case is obvious: more efficient aircraft lead to lower costs. For the disruptive technologies: these are still unproven and cannot yet fully replace existing flights. This means that airlines need to consider new business models. Only when these technologies are proven to be both technically and operationally feasible will airlines begin to adopt them.

14. As regards sustainable aviation fuels, do you consider that public support should primarily focus on:

- ☒ Addressing the price gap to conventional fuels, in order to incentivise investors and airlines to switch to sustainable aviation fuels
- ☒ Innovation
- ☐ Production
- ☐ Aviation services and infrastructure (such as refuelling, infrastructure for transport and blending of sustainable aviation fuels)

Please substantiate your reply.

All SAF are significantly more expensive than jet fuel, so there is no demand for them before or above the level of ReFuelEU. Market disruptions are expected when higher blending requirements take effect, particularly in 2030. In addition, the global availability of used cooking oil (UCO) and tallow (9B) for HEFA production is limited. Public support is needed for innovation in aviation fuels, such as alternative feedstocks (e.g. intermediate crops) and production pathways (e.g. Alcohol-to-jet). If left to the market again, shocks can be expected as the supply of UCO dwindles.

15. Do you believe that disruptive technologies and zero-emission aircraft can play a major role in the decarbonisation of the aviation sector?

- ☒ Yes
- ☐ No
- ☐ I don't know

Please substantiate your reply and submit any data/information/study etc you may have in this regard.

Yes. Battery electric and hydrogen powered aircraft have the potential to significantly reduce carbon emissions, especially on short- and medium haul routes.

15.1. Do you believe that regional airports can play a significant role in the rollout of disruptive technologies and zero-emission aircraft and thus in the decarbonisation of the aviation sector?

- ☒ Yes
- ☐ No
- ☐ I don't know

Please substantiate your reply.

Yes, as mentioned above: regional airports can play an important role in the implementing and scaling-up disruptive technologies. These airports often have more flexibility and space than larger airports. Regional airports are ideal test beds for new technologies. In addition, these new technologies are primarily available for smaller aircraft on shorter routes.

16. Beyond the provisions and the possibilities offered by the State aid rules in place dealing with environment and climate (e.g., under the CEEAG, as set out in the introduction above), do you see a need for additional State aid tools/incentives to promote the decarbonisation of the aviation sector?

- ☒ Yes
- ☐ No
- ☐ I don't know

Please substantiate your reply.

Yes, additional State aid tools and incentives may be needed to accelerate the decarbonization of the aviation sector. The measures under the CEEAG provide a good basis, but it is important to have as many incentives as possible to promote sustainable aviation.

16.1. What are the gaps that would need to be filled?

- Policy incentives such as partial exemptions from airport charges, should encourage airlines to operate new routes with battery-electric or hydrogen-powered aircraft.
- Aid for training and certification of personnel in zero-emission aviation technologies with higher aid percentages than under Article 31 of the GBER (this is necessary due to a great shortage of skilled staff).
- Definitions under the CEEAG are not always clear, e.g.: it is not yet clear whether the production of intermediates for SAF can also be subsidized.

17. Should some form of green conditionality of State aid be introduced in the Aviation Guidelines to incentivise airports to adopt sustainable practices (e.g., the use of alternative fuels, energy-efficient technologies, and waste reduction strategies)?

Green conditionality: Conditions which can be imposed on aid measures, to render them more environmentally acceptable and reduce negative externalities such as noise pollution, air quality and greenhouse gas emissions.

- ☐ Yes
- ☒ No
- ☐ I don't know

Please substantiate your reply.

It should be up to the EU Member States/ granting authorities to decide whether or not to impose green conditions on aid measures based on the Aviation Guidelines. We do recognize that by making sustainability a condition for State aid, airports and airlines could have a stronger incentive to implement sustainable and innovative solutions. This will accelerate the energy transition in aviation and may also opens up new market opportunities for the aviation sector.

18. Should the revised Aviation Guidelines include specific provisions to allow support in favour of multimodality in order to decrease overall emissions (greenhouse gas emissions, pollutants and noise) and climate impacts of the aviation sector?

Multimodality meaning an integrated concept whereby different modes of transportation (air, road, rail etc.) are combined on a given travel route, e.g., by replacing a short-haul feeder / connection flight by rail or long-distance busses in order to reduce the emissions of air traffic.

- ☒ Yes
- ☐ No
- ☐ I don't know

Please substantiate your reply.

There are significant differences in the way the air and rail sectors operate. Launching a multimodal product often requires, a pilot phase to align processes such as booking, ticketing and scheduling before a multimodal route can become profitable. Multimodality can contribute to the connectivity of Europe and the reduction of greenhouse gases, especially in the context of saturation of airport capacity. However, multimodal products are often not eligible for State aid because of the overlap between sectors.

18.1. Which form of public support would be appropriate to such objective and how could this be addressed under the revised Aviation Guidelines?

Additional provisions for Member States and granting authorities to allow State aid in favour of mulitimodality could include, for example, subsidies during a pilot phase and fiscal measures.

## **F. Other points (6/6)**

19. Do the Aviation Guidelines contribute sufficiently to the competitiveness of the European aviation sector?

- ☒ Yes
- ☐ No
- ☐ I don't know

Please substantiate your reply.

We have no indications that the Aviation Guidelines do not contribute sufficiently to the competitiveness of the European aviation sector.

20. Are the Aviation Guidelines overall, sufficiently clear (definitions, application and interpretation of tests in practice etc.)?

- ☒ Yes
- ☐ No
- ☐ I don't know

Please substantiate your reply.

We have no indications that the Aviation Guidelines as a whole are not sufficiently clear.

21. Are there any lessons from the COVID-19 pandemic to be considered in the revision of the Aviation Guidelines, also with a view to potential future crises?

- ☒ Yes
- ☐ No
- ☐ I don't know

Please substantiate your reply.

A provision on special external forces (such as a pandemic) can be added to the Aviation Guidelines. This will make them more applicable in those circumstances where rapid action by EU Member States (e.g. in the form of State-aid) is needed.

22. The Aviation Guidelines do not include specific compatibility criteria for airports and airlines that are specialised in freight transport and only foresee general compatibility criteria depending on the specific type of aid (operating aid, investment aid or start-up aid) that equally apply to both air transport segments. Should the Aviation Guidelines specifically support airports and airlines specialised in freight beyond the general possibilities?

The Aviation Guidelines provide for rules regarding mixed passenger/freight airports, obliging parties to notify aid measures that concern airports handling more than 200 000 tonnes of freight during the last two financial years.

- ☒ Yes
- ☐ No
- ☐ I don't know

Please substantiate your reply.

Some regional airports specialize on cargo operations. As the transport of cargo is an important element of air mobility as well, making the Aviation Guidelines compatible for this mode of transport makes sense.

22.1. Please identify specific scenarios for freight traffic in which public support would be required and that could be addressed by the Aviation Guidelines.

/

22.2. Please elaborate on a possible approach under State aid rules to help address such specific scenarios for freight traffic, in particular which suitable indicators and thresholds could be introduced to assess the compatibility of aid measures in that respect.

/

23. When assessing the compatibility of aid measures, the Aviation Guidelines stipulate that such measures should not lead to a duplication of unprofitable airports or additional, unused capacity. To assess that, the Aviation Guidelines take into account existing airports within the defined 'catchment area'. The Fitness Check however indicated that such duplication of unprofitable airports or creation of unused capacity only occurred in limited instances. Against that background, to what extent is the duplication of unprofitable airports and creation of unused capacity still an issue in today's market environment?

Definition of catchment area in the Aviation Guidelines: "‘catchment area of an airport’ means a geographic market boundary that is normally set at around 100 kilometres or around 60 minutes travelling time by car, bus, rail or high-speed rail; however, the catchment area of a given airport may be different and needs to take into account the specificities of each particular airport. The size and shape of the catchment area varies from airport to airport, and depends on various characteristics of the airport, including its business model, location and the destinations it serves".

- ☐ Significantly
- ☐ Moderately
- ☐ Marginally
- ☐ Not at all
- ☒ I don't know

Please substantiate your reply.

This is not the case in the Netherlands.

24. Do you consider the current approach and the definition of a 'catchment area' as contained in the current Aviation Guidelines still fit for purpose?

- ☒ Yes
- ☐ No
- ☐ I don't know



Please substantiate your reply.

The definition is applicable; however, it is important to put more emphasis on the 'specificities of each particular airport' when assessing the catchment area.

25. Besides the specific questions and issued raised in this questionnaire, are there other points that in your view would need to be addressed by the revised Aviation Guidelines and potentially require State support measures for the aviation sector which would appear necessary/useful?

- ☐ Yes
- ☒ No
- ☐ I don't know

Please substantiate your reply.

/

## Contact

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