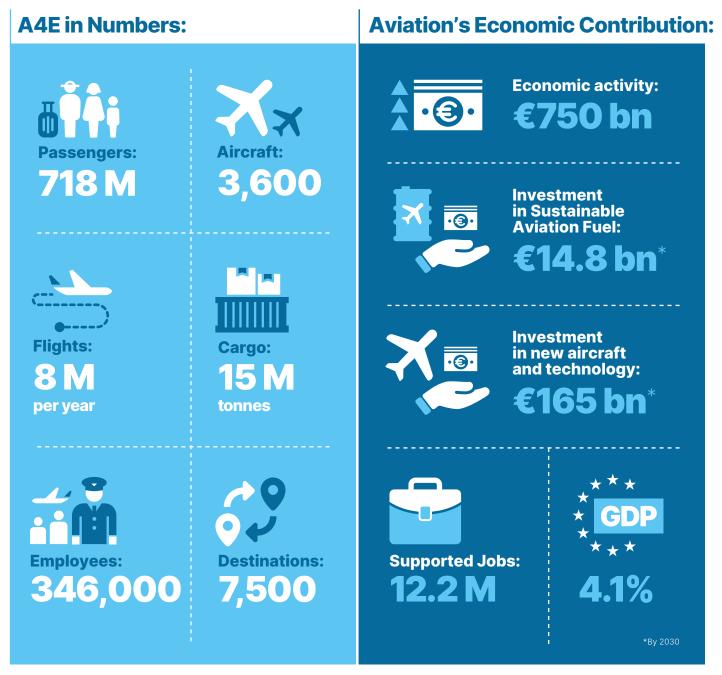
Airlines for Europe (A4E) is Europe's largest airline association. Based in Brussels, A4E works with policymakers to ensure aviation policy continues to connect Europeans with the world in a safe, competitive and sustainable manner.







Airlines connect people, employ people, open horizons and opportunities for Europeans. Aviation is at the heart of the EU. It drives its economic growth, creates jobs throughout the continent, facilitates trade within the internal market and with the rest of the world.

Airlines help bring to life one of the cornerstones of European integration through the free movement of people and goods. But more work still needs to be done.

Competitive Decarbonisation

Greening is aviation's 'license to grow' but at the same time, its economic and social benefits, its role in generating growth and ensuring connectivity within the EU and beyond must be fully recognized. The whole aviation ecosystem needs to increase cooperation to accelerate its decarbonisation.

The implementation and impact of the 'Fit for 55' package on the sector must be closely monitored to avoid competitive distortion and carbon leakage, and ensure a level playing for EU businesses.

A4E is asking to:

- + establish a pipeline of investment for SAF production.
- ✤ facilitate access to funding and investments from both private and public sectors.
- ✤ prepare for an increase the number of EU ETS "SAF Allowances" beyond 2030 if a mature market is not achieved.
- → reduce the cost of available SAF in the EU to bring it closer to the cost of jet fuel.
- ✤ implement a true Single European Sky and reform airspace to obtain more efficient flight routing, reducing costs and emissions by up to 10%.

Complete the Single Aviation Market

The EU should aim to strengthen the global competitiveness of the European aviation industry, ensuring that European airlines do not suffer from a competitive disadvantage. It can do so by improving the competition-neutrality of its regulatory environment. The EU must refrain from creating an unnecessary regulatory burden or by tabling new legislation or revisions where existing legislation is still fit for purpose, for example in the case of the EU Slot Regulation.

The single aviation market is one of the EU's biggest success stories having created new business models, made aviation more accessible and increased consumer choice. Yet, longstanding structural issues undermine its effectiveness: airspace, taxation, airport charges, strikes of air traffic controllers. Taxes not earmarked for reinvestment hinder our agreed decarbonisation roadmap. We need fewer and clearer rules, the halting of interventionist national initiatives undermining the single aviation market. A strong and competitive European transport market can significantly contribute to economic growth in Europe.

The European Commission must assess whether existing legislation negatively impacts the competitiveness of the European aviation industry, and where it does, rebalance the regulatory framework.

A4E is calling for:

- ✤ A review of Directive 2009/12 on airport charges (ACD).
- ✤ A clearer, more robust regulatory framework. This means:
 - 1. targeting economic regulation at airports with significant market power (SMP),
 - 2. detailed rules on consultation and transparency in the setting of charges that allow for the effectiveness of the process, and
 - 3. ensuring Member States have a fully independent and adequately resourced regulator that can effectively intervene as required.
- The impact of air traffic control strikes on the functioning of the internal market needs to be addressed. The major disruption created by ATC strikes jeopardize the free movement of citizens and of goods, enshrined in the EU Treaties. A balance must be achieved between the right to freely move and the right to strike.
- ✤ The EU must secure a role to guarantee that overflights are protected ("obligation de résultat") while ensuring this is not at the expense of departures and arrivals in the country where the strike originates.
- ✤ Finally proceed and quickly conclude the revision of Regulation 261/2004 on air passenger rights to establish a clear, proportionate and stable legal framework on air passenger rights.

