

EU Sustainable tourism strategy Joint feedback to the call for evidence

The airline sector is a key enabler of connectivity and competitiveness for European tourism, with 56% of international and 46.5% of intra-EU tourists travelling by air¹.

In 2023, aviation generated €770 billion in EU GDP (4.5% of the EU total)², enabled travel to 2,800 destinations, and carried over 771 million passengers in 2024³ - confirming its vital socio-economic contribution. Over 80% of visitors to Spain and nearly 74% of visitors to Greece arrived by air in 2023.

Against this backdrop, it is essential that the forthcoming European Strategy for Tourism supports both the competitiveness of the airline sector and its decarbonisation efforts.

Building on the European Agenda for Tourism 2030⁴ and the Transition Pathway for Tourism⁵, we urge the European Commission and DG MOVE to acknowledge the airline sector's strategic role for tourism.

A4E and IATA have identified the following key priorities:

1. Ensuring competitiveness while supporting the green transition in aviation

Europe's aviation sector is at a pivotal moment. The Draghi Report on EU Competitiveness estimates that the cost of decarbonising aviation could reach €61 billion annually between 2031 and 2050. Regulatory measures have already significantly increased the cost of flying to, from, and within the EU.

While these measures represent significant progress, substantial challenges remain. Climate policies must align with industry realities, not compromise the sector's competitiveness and be formulated in such a way which does not price the customers out of the market. Flying must remain accessible and affordable to all, incl. in the peripheries of Europe.

To maintain and improve travel within and to/from Europe while supporting the green transition, the EU should prioritise closing the price gap between Sustainable Aviation Fuels (SAFs) and conventional jet fuel. SAFs are essential to reach net-zero emissions by 2050, delivering 56% of aviation's emission reductions⁶. However, SAF availability remains limited, and costs are currently at least three times higher than conventional kerosene, especially for synthetic SAF (eSAF).

Additionally, EU ETS compliance costs are projected to exceed €6 billion annually by 2030, further challenging global competitiveness⁷.

¹ UN Tourism, International Tourism Highlights, 2024

² ATAG, Aviation Benefits Beyond Borders, 2024

³ A4E, A4E Facts and Figures, 2025

⁴ European Agenda for Tourism 2030, Council conclusions (adopted on 01/12/2022) [pdf](#).

⁵ Transition Pathway for Tourism, 2022, [Transition pathway for tourism - Publications Office of the EU](#)

⁶ D2050 Roadmap, 2025

⁷ A4E, Assessment of the cost of regulatory compliance of European Airlines, 2025

2. Refraining from introducing additional taxes on aviation

No additional taxes - such as an aviation fuel tax or VAT - should be imposed on aviation. These measures increase travel costs and divert funds that could otherwise support the decarbonisation of the sector, ultimately discouraging travel and weakening tourism economy.

Taxes are a blunt policy tool that can suppress demand and prevent tourism from delivering its full social and economic benefits. The EU as well as Member States should reconsider existing taxes, such as air passenger or tourist taxes, to preserve the competitiveness of Europe and its destinations.

3. Improving the balance of EU passenger rights regime

European airlines operate in a highly competitive market where unilateral EU policies significantly raise the cost of flying to, from, and via the EU. Many non-EU jurisdictions, including nearby non-EU countries, have significantly less comprehensive air passenger rights compared to EU261, often without a compensation regime. It is therefore essential to ensure that EU261 delay compensation thresholds are raised to match European airlines' operational realities as was suggested by the European Commission in its 2013 proposal to revise Regulation 261/2004 on air passenger rights.

4. Promoting a fair digital transition

We support efforts to encourage the development of multimodal travel solutions as a means to strengthen European tourism.

A ticketing-based solution alone will not deliver a multimodal transport environment. This is because two separate transport services bundled together by an intermediary in a single transaction does not constitute a multimodal travel offer per se, but rather a combination of distinct services. For such offers, transport operators have no established relationship with one another and are often unaware that their offers have been bundled and sold as a single product by a third party. This lack of relationship means that bundled offers by intermediaries cannot offer a level of passenger protection comparable to integrated multimodal offers.

Although currently limited, there are a growing number of integrated multimodal offers being put to market by transport operators across Europe. The barriers to pan-European integrated multimodal transport include the lack of integration between air and rail tools, too few multimodal hubs across Europe, different distribution models and insufficient cross-border railway offering. In this context, obligations for air carriers to share their content in the context of multimodal travel solutions or digital platforms that integrate transport and tourism services would not deliver multimodality and would solely benefit travel intermediaries at the expense of airlines' commercial freedom and at a cost for consumers.

5. Enhancing the travel experience for all tourists

The EU should create a framework so that technology solutions can provide a fully digitalized end to end travel experience. Our industry's vision is to streamline the passenger journey with advance sharing of information and a contactless process at the airport, based on biometric-enabled identification.

Key enablers will be the upcoming EU Digital Travel application, as the uniform standard for digital travel credentials, and the progressive optimisation of border control procedures.

6. Encouraging a balanced approach to sustainable tourism

We recommend that the EU adopt a balanced approach when promoting tourism destinations. Imposing external limitations to allegedly address environmental concerns is not an effective solution. Such restrictions risk undermining connectivity, freedom of movement, and consumer choice – all fundamental pillars of the EU internal market.

In conclusion, the international and European airline industry plays a strategic role in the success of a competitive and sustainable European tourism industry. We call on the European Commission to fully reflect this in its forthcoming tourism strategy.

The EU Tourism Strategy, together with the upcoming Sustainable Transport Investment Plan (STIP), should pave the way for a comprehensive EU Aviation Strategy that safeguards competitiveness while advancing sustainability.