

Brussels, 12 February 2025

**European Commission**

Ms Ursula von der Leyen

President; European Commission

**CC**

Ms Teresa Ribera Rodríguez

Executive Vice President

Mr Stéphane Séjourné

Executive Vice President

Mr Raffaele Fitto

Executive Vice President

Mr Apostolos Tzitzikostas

Commissioner

Mr Andrius Kubilius

Commissioner

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Ministers of Europe

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Director General; DG BUDGET

## Competitive & Sustainable Aviation

Dear Commission President Ms von der Leyen,

On behalf of the European Aviation Industry, we ask you to take immediate action to ensure our industry's effective and successful transition to net zero – and thus enable us to keep delivering the air connectivity that is crucial for the EU's cohesion, competitiveness and global position. This is a strategic challenge for the EU, considering that every +10% increase in air connectivity yields +0.5% in GDP per capita along with +1.6% in employment and -14% in poverty reduction.

**DESTINATION 2050** is the industry alliance committed to net zero carbon emissions by 2050, representing the key pillars of the European Aviation industry, including civil aeronautical industry such as airframe, engine and equipment manufacturers, airlines, airports, and air navigation service providers. Formed by A4E, ACI EUROPE, ASD, CANSO Europe and ERA, our alliance has just published the updated European Aviation Industry Roadmap, "A Route to Net Zero European Aviation"<sup>1</sup>.

This comprehensive Roadmap review comes with stark warnings:

- **Our roadmap shows that we can still meet the 2050 net zero target, but that this will not be achievable without further immediate EU public support,**
- **Sustainable Aviation Fuels (SAFs) is the key decarbonisation pillar – with massive challenges ahead as regards access to feedstock, production and costs,**
- **SAFs go hand in hand with more efficient technology & Air Traffic Management (ATM) reducing fuel burn and emissions. The report shows that SAF as well as aircraft and engine technology will account for 83% of emissions reductions by 2050,**
- **The premium expenditures of decarbonisation have ballooned over the past 4 years, having increased by €480 billion and now reaching €1.3 trillion,**
- **All this means that we cannot do this alone – and that action from the EU and National Governments is required now to effectively enable the**

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<sup>1</sup> [www.destination2050.eu/roadmap](http://www.destination2050.eu/roadmap)



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**delivery of the clean technologies that Europe's aviation needs to remain competitive and reach net zero.**

It is therefore paramount that European aviation is included in the forthcoming Clean Industrial Deal with a specific Action Plan for our sector that addresses 4 key areas:

1. **Setting out a SAF industrial policy, including the necessary financial tools,**
2. **The European aerospace sector is a world leader in aircraft, engine and ATM technology. We need to preserve this unique capability. Accelerating research, innovation and deployment through increased funding for SESAR and Clean Aviation in the next MFF is essential. At the same time protecting the budget of the European Union Aviation Safety Agency (EASA) from further cuts in the next MFF so that new technologies can be certified and deployed without delays,**
3. **Implement the recommendations of Mario Draghi to aid the sector's transition to net zero. It is paramount to simplify and reduce regulatory burden while ensuring a consistent supportive regulatory and investment framework building on the ReFuelEU Aviation Regulation,**
4. **Ensuring our low carbon energy and critical raw material needs are factored in EU & national energy and critical raw material policies and plans.**

This request aligns with the joint letter sent to you on 5 February by 16 leading think tanks, civil society groups and other industry associations calling for a joint Decarbonisation and Competitiveness Roadmap that transforms ambition into action.

It would ensure that the EU moves ahead with a comprehensive and holistic Aviation Strategy duly focused on enabling decarbonisation while preserving the unique economic and social benefits of air connectivity.

We have set out in an Annex to this letter our proposal for a European Aviation Strategy.

**Time is of the essence.** The transition to net-zero carbon aviation can only succeed through a well-coordinated and collaborative effort between all stakeholders. Otherwise, our sector **risks becoming a casualty of EU Climate Action without the**



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**necessary means of implementation, with far reaching impact on prosperity and competitiveness.**

We look forward to engaging with you and working together to make aviation's transition to net-zero carbon a reality.

Yours sincerely,

Ourania  
Georgoutsakou  
A4E  
Managing  
Director



Olivier Jankovec  
ACI EUROPE  
Director  
General



Jan Pie  
ASD  
Secretary  
General



Simon Hocquard  
CANSO  
Director General



Montserrat  
Barriga  
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Annex: European Aviation Strategy for Decarbonisation

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## EUROPEAN AVIATION STRATEGY FOR DECARBONISATION

**European Aviation Industry urges the European Commission to set a clear long term strategy for decarbonisation of European Aviation**

### 1. Prioritise European aviation as a critical and essential sector within the Clean Industrial Deal

- **Global sector:** Aligning with international efforts will enable the competitive decarbonisation of the European aviation industry within a global framework. The EU must address competition distortions in aviation caused by the 'Fit for 55' package and take steps to prevent carbon leakage.
- **Societal and economic benefits:** Aviation is essential to Europe's cohesion – connecting islands and remote regions with mainland Europe while fostering cultural and economic opportunities. It plays a fundamental societal role, creating high-quality, skilled jobs across the ecosystem and driving research and innovation. New products and services brought to market by European aviation generate economic prosperity, facilitate freedom of movement, and promote trade, cultural exchange, and stability.
- **Major economic driver:** As highlighted in Mario Draghi's report, *The Future of European Competitiveness*, aviation is a cornerstone of the EU's economic strength. It drives job creation, cross-sector prosperity, and positions Europe as one of the most connected regions globally. In **2019**, air transport supported **14 million jobs** and contributed **€851 billion to GDP** in Europe<sup>2</sup> – equivalent to 1 in every **17 jobs** (**6%** of total employment) and **5%** of the continent's GDP. The European industry is a world leader in the design and manufacture of civil aircraft, with exports amounting to **€98.3 billion in 2022**, positively contributing to the EU trade balance. Continued economic growth is an enabler of Europe's environmental ambitions.
- **Sovereignty and economic security:** Aviation supports essential, reliable transport routes and contributes to Europe's defence capabilities, upholding both sovereignty and economic security. A strong aerospace and defence sector is a foundation for prosperity, enabling the investments needed for decarbonisation. Additionally, space activities play a unique role in sustainability, driving advancements in climate monitoring, resource management, and environmental protection. Maintaining a robust supply chain within Europe further safeguards our sovereignty and economic security.
- **Hard-to-abate sector:** Aviation is inherently a hard-to-abate sector, with stringent safety standards and technology certification requirements. While we are taking

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<sup>2</sup> Europe i.e. EU, UK and EFTA.



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responsibility and action to decarbonise our sector, achieving net-zero emissions at pace will require further support from the EU to maintain momentum and contribute to both international aviation-specific and EU climate objectives.

**Therefore, we urge the European Commission to recognise that aeronautics and civil aviation are strategic sectors for Europe.**

## 2. Implement an EU Industrial Strategy for the development of Sustainable Aviation Fuels (SAFs)

### 2.1 Market dynamics and addressing the price gap for SAF

- **Increase EU Emissions Trading System (ETS) SAF Allowances:** To help airlines bridge the price gap between kerosene and SAF, significantly increase the currently available number of EU ETS SAF allowances and extend the scheme's original timeline beyond 2030.
- **Facilitate access for the use of biomass for aviation:**
  - **Prioritise access to the use of biomass for aviation.**
  - **Align feedstock eligibility:** Continuously review and align the EU's feedstock eligibility criteria with global standards to ensure the success of the ReFuelEU Aviation regulation and reduce the risk of over-reliance on imports.
  - **Remove restrictions on non-biogenic CO<sub>2</sub>:** Eliminate the 2041 limitation on non-biogenic CO<sub>2</sub> usage.
- **ReFuelEU Aviation Regulation:**
  - **Avoid upward revisions:** Ensure the 2027 revision does not increase bio- or e-fuel targets in the mandate.
  - **Gradual SAF supply increases:** Introduce incremental increases in SAF supply rather than stepped increases every five years.
- **Balance SAF costs fairly:** Implement a system, such as a Carbon Border Adjustment Mechanism (CBAM)-like mechanism, to fairly distribute SAF costs between EU and non-EU airlines, to reduce carbon leakage.
- **Strengthen the Renewable & Low Carbon Fuels Alliance (RLCF),** making it more agile and effective in fostering collaboration across the ecosystem and in turn public and private investment in SAF production.

### 2.2. Reducing the Cost of SAF

- **De-bureaucratise and de-risk SAF production: Provide direct EU funding for** refinery creation or establish an **EU Contracts for Difference (CfD) mechanism** funded through a portion of EU ETS revenues for those airlines which contribute to the scheme. Support this, in part, through the Sustainable Transport Investment Plan.



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- Integrate **low carbon electricity needs**: Include electricity requirements for SAF (and hydrogen) production in the EU's energy supply plans and national equivalents, earmarking sufficient clean energy supply for airports.
- Implement an **EU Book and Claim System** as a way to support the deployment of SAF until it becomes available at all required locations.

### 3. Accelerate innovation, support research and foster funding for aviation decarbonisation

- Unlock **industrial investment tools**: The EU can unlock powerful investment tools, supported by the European Investment Bank, including repayable advance schemes and more ambitious venture debt funding for aviation.
- **Earmarking ETS revenues**: ETS revenues used by Member States should better contribute to the decarbonisation of affected industries, specifically hard-to-abate sectors such as aviation. Revenues should prioritise the decarbonisation transition, channelled towards research, development, and deployment of clean technologies. Mechanisms such as green Public Service Obligations (PSOs) could also enhance competitiveness in these industries.
- **Simplify the ETS Innovation Fund**: The existing ETS Innovation Fund could benefit from simplified administrative procedures and improved selection criteria for e-SAF production and other aviation projects.
- **Leverage EU instruments**: All available EU instruments, such as **the Connecting Europe Facility (CEF)**, **InvestEU** and the **European Structural and Investment Fund (ESIF)**, should be leveraged to deploy new aircraft technologies at scale.
- **Innovation research umbrella strategy**: The EU should establish a dedicated innovation research umbrella strategy and programme for aeronautics and aviation, consolidating resources under a unified framework and a collectively defined work programme. As highlighted in the Heitor report on Framework Programme 10 (FP10), this should guarantee dedicated research funding instruments for civil aviation with an **increased budget** compared to Horizon Europe, aligned with the EU's and civil aviation sector's ambitions to move to climate neutrality by 2050 and the Digital European Sky vision. Key focus areas should include design efficiencies, production system advancements, supply chain resilience through onshore capabilities, and protecting European technological sovereignty.
- **Support the SESAR 3 and Clean Aviation Joint Undertakings**: These two aviation-related public-private partnerships address complementary fields of aviation research. Their difference notably lies in the types of technologies they concern and the actors they unite, and this is appropriately reflected in their individual governance, membership, budget and work plans. To ensure their continued success, these undertakings should be preserved with separate, non-competing budgets.
- **Strengthen EASA's role**: **The European Union Aviation Safety Agency (EASA)** is a strategic agency that enables the industry to bring products to market with appropriate safety certification. Increased EU-funded financial and personnel resources for EASA are essential to maintaining its focus on safety while supporting the sustainability and digital



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transformation of the aviation sector through its new ReFuelEU Aviation competences. A well-resourced EASA ensures that new products can be brought to market at the pace needed to safeguard Europe's aviation competitiveness and decarbonisation ambitions.

- Invest in **energy efficiency and technology**: Increased energy efficiency reduces aviation's energy demand. Continued support for Clean Aviation is essential to advancing more efficient and innovative aircraft. Research efforts should focus on highly efficient aircraft and propulsion systems, innovative wing and fuselage configurations, electrification and hybridisation, as well as collaborative platforms and alternative fuels (including hydrogen and SAF).
- **Mitigate non-CO<sub>2</sub> climate impacts: Aviation's non-CO<sub>2</sub> climate impacts must also be addressed**. Increased funding for research and collaboration among stakeholders, including ATC, airlines, OEMs, and researchers is needed to perform additional scientific studies to improve the accuracy of models used for mitigation, monitoring, reporting, and verification, and conducting flight trials at a larger scale to inform mitigation strategies.

#### 4. Prepare the European aviation ecosystem for hydrogen and electric aircraft

- **Support investment in infrastructure**: Facilitate investment in hydrogen infrastructure – including electrolysis, liquefaction plants, gaseous pipeline networks, liquid hydrogen (LH<sub>2</sub>) distribution, storage, and refuelling – as well as electric charging infrastructure at airports. EU funding mechanisms, such as the European Investment Bank, Connecting Europe Facility, Cohesion Funds, and Regional Funds, should support these investments. These are essential to accommodate and supply the energy volumes required for deploying zero-emission aircraft. Additionally, accelerate the authorisation process to expedite the development of this critical infrastructure development.
- **Integrate renewable electricity needs**: Incorporate electricity requirements for electric charging and hydrogen production into the EU's energy supply plan.
- **De-risk hydrogen production**: Establish **EU Contracts for Difference (CfD) mechanisms** for hydrogen, funded in part through EU ETS revenues, for those airlines which contribute to the scheme.
- **Incentivise zero-emission routes**: Promote air traffic routes and networks with zero carbon emissions in flight, starting with Public Service Obligation (PSOs) routes.
- **Strengthen the Alliance for Zero Emission Aviation (AZEAA)**: Integrate AZEAA into European Commission policy-making and enhance its agility and effectiveness.





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## 5. Support the modernisation and digitalisation of Air Traffic Management (ATM) led by the SESAR Joint Undertaking

- **SESAR's strategic role:** SESAR is vital to advancing the EU's digital and climate goals. **Modernising ATM** enhances passenger safety, increases capacity, improves cost efficiency, reduces delays, optimises airline operations, and delivers significant environmental benefits. SESAR aims to enable the most efficient and sustainable ATM operations across Europe and beyond.
- **Continued funding and support:** Ensure joint EU funding beyond 2027 for research and innovation and deployment. Political support for SESAR is essential to create incentives for early movers, accelerate key SESAR technology developments, and maintain collaboration, digitalisation, and climate impact reduction.
- **Stakeholder involvement:** Ensure continued involvement of the operational stakeholders – air navigation service providers, manufacturers, airspace users and airports – in SESAR governance and management activities.

## 6. Incentivise the uptake of Carbon Capture Utilisation (CCU) for aviation

- **Invest in CCU R&D:** Support investments in CCU research and technology through instruments like the EU ETS Innovation Fund, Horizon Europe, and the Connecting Europe Facility. There is significant potential to couple CCU with SAF production, enabling carbon-negative SAF through CO<sub>2</sub> capture during the manufacturing process and/or via the creation of biochar from bio-based residues.
- **Integrate negative emissions into the EU ETS:** By 2026, include negative emissions in the EU ETS framework to support their adoption.
- **De-risk carbon removals:** Introduce a CfD mechanism for carbon removals, partially funded through EU ETS revenues for those airlines which contribute to the scheme.
- **Ensure SAF allowance benefits:** Allow low-carbon synthetic fuels to benefit from the 20 million SAF allowances included in the EU ETS.
- **Establish SAF allowance initiatives:** Develop initiatives to offer free SAF allowances, helping mitigate the cost of rising mandates while ensuring that the amount of allowances is substantial and sufficient.



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## 7. Strengthen CORSIA and international cooperation to enable future technologies and align international standards to those of the EU at ICAO level

- **Global solutions for global problems: Environmental diplomacy** is critical to implementing global frameworks and roadmaps. Collaborative work with ICAO and other states is essential to assisting Member States in delivering the Long-Term Aspirational Goal (**LTAG**) for international aviation, strengthening CORSIA, and establishing an **ambitious global SAF** policy to tackle non-CO<sub>2</sub> emissions through international approaches.

## 8. Recognise the specificities of the aviation industry in EU regulations

- **EU ETS allowances after 2026:** Aviation is the only sector that will no longer benefit from free EU ETS allowances after 2026. This, along with the relatively higher cost of SAF and required investments in latest generation aircraft, will bring a significant additional cost to airlines. The Energy Taxation Directive (ETD) should exempt aviation in the current revision until at least 2035, in order to support the significant investment airlines need to make to decarbonise while maintaining global competitiveness.
- **REACH and ESPR flexibility:** Regulations like REACH and the Ecodesign for Sustainable Products Regulation (ESPR) should take into consideration the aerospace industry's unique airworthiness and safety standards, long lifecycles and complex global supply chains. PFAS restrictions should consider aviation-specific needs, especially for fluoropolymers. Indeed, as recognised by the European Union Aviation Safety Agency (EASA) and the European Chemicals Agency (ECA), PFAS are essential to the aviation industry due to their unique properties, and no alternatives currently exist that meet the same safety requirements. Failure to address this will delay the deployment of the most efficient aircraft and, consequently, hinder the sector's ability to decarbonise.
- **Temporary use of hazardous materials:** Acknowledge that hazardous chemicals and materials may be temporarily necessary for reaching climate targets by enabling key clean technologies until alternatives are developed. Align **the EU taxonomy's Do No Significant Harm (DNSH)** criteria with REACH exemptions and include Helicopter and Business Jet manufacturing in future revisions.
- **Structural alignment with REACH:** Revisions to the Climate Taxonomy Delegated Act should ensure alignment with REACH to streamline compliance.



## 9. Strengthen the industrial ecosystem to develop and deploy low-carbon aviation technologies

- **Support critical raw materials and advanced materials:** Ensure appropriate resource allocation to value chains and technology-enabling material ecosystems that are critical for aviation decarbonisation.
- **Simplify Research & Development (R&D) participation:** Improve access to R&D investments and encourage participation in public-private partnerships to foster industrialisation and accelerate innovation.
- **Promote emission capture technologies:** Encourage investments in emission-capture technologies and modernise existing processing plants to reduce Europe's dependency on imports.
- **Promote and incentivise emission capture technologies for hazardous chemicals:** Promote and incentivise emission capture technologies when hazardous chemical use is currently unavoidable.
- **Develop "Safe & Sustainability by Design" materials:** Strengthen initiatives that promote the development of materials designed with safety, sustainability and environmental considerations at their core.
- **Address supply chain gaps:** Identify current gaps in European material supply chains and address immediate needs to increase competitiveness and protect sovereignty
- **Net Zero Industry Act: Leverage the Net Zero Industry Act to** create a one-stop shop that supports and promotes innovation, while connecting sellers and buyers across the aviation ecosystem.

## 10. Reduce & simplify the regulatory burden

- **Ensure a level playing field:** Address the heavier and more numerous compulsory sustainability requirements imposed on EU companies compared to their non-EU competitors:
  - Acknowledge both quantitatively and qualitatively the regulatory due diligence and reporting gaps between EU and non-EU regulations, as well as inconsistencies among EU Member States.
  - Establish strong EU/non-EU equivalence mechanisms to reduce the burden on companies (e.g. through an EU reference guide or soft law instrument).
  - Develop EU ESG diplomacy (sustainability and climate) to speed up adoption in non-EU countries, through discussions in Free Trade Agreements and bilateral negotiations.
  - Provide incentives/benefits for companies complying with EU rules without creating additional administrative burdens.
- Strengthen **the Sustainable Finance Framework: Ensure the Framework supports** companies in attracting private investments for transitional activities.
  - Increased industry involvement in rulemaking processes, including representation on the Platform for Sustainable Finance.



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- Focus more on incentivising investments in transitional activities, encouraging banks and investors to recognise these efforts as eligible for sustainable finance.
- **Reduce reporting and compliance burdens:**
  - Conduct a review to identify and align common or overlapping data points between regulations, including SFRD, CSRD, CS3D, CBAM and Taxonomy. Aim to reduce significantly the number of required data points, for instance, through the Omnibus for Reporting proposal.
  - Provide CBAM flexibility guidance to allow the use of default values in situations where collecting actual values is overly complex, especially for supply chain SMEs and mid-tier enterprises.
  - Explore the creation of a secure EU data space (cloud) to centralise and re-use various reporting requirements at EU and national levels, reducing duplicated transmissions.
- Timely publication of the guidance: Publish regulatory guidance promptly to avoid or minimise divergences in transposition laws, reduce uncertainty and limit over-implementation.

## 11. Ensure sufficient resources are allocated to sustain each value chain and support a specific sector or technology enabling material ecosystem.

- **Strengthen the link between the CRM Act and sovereign funds:** Maximise leverage within and across sectors by linking the Critical Raw Materials (CRM) Act with sovereign funds. For example, develop melting and forging capacity to enable proper reuse and simplify material traceability processes to support aviation.
- **Promote emission-cleaning technologies:** Incentivise investments in emission-cleaning technologies where hazardous chemicals are necessary for the industry.
- **Incentivise material substitution R&D: Support research and development into critical raw material substitution** and better promote innovation in advanced materials to enhance global competitiveness.
- **Prioritise recycling: Bolster sovereignty** and reduce external dependencies by prioritising recycling and scaling up material recycling technologies, facilities, and channels across Europe.

**Support for low-carbon energy:**



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- **Review the PFAS ban's impact:** Assess the cost-benefit impact of the fluoropolymer restrictions under the PFAS regulation on clean technologies, including SAF and hydrogen ecosystems.
- **Acknowledge temporary use of hazardous materials:** Recognise the necessity of hazardous chemicals and materials in achieving climate targets, while prioritising environmental, health, and safety (EHS) conditions and pollution control.

#### **Regulatory support for innovation:**

- **Leverage regulatory sandboxes:** Promote and support the use of regulatory sandboxes to test and unleash the full potential of European innovation.
- **Utilise a one-stop shop: Create a one-stop shop** to support and promote innovation in projects aimed at reducing aviation's environmental footprint. This should include connecting sellers and buyers and reducing administrative burdens.
- **Incentivise circularity:** Reduce regulatory restrictions on reuse and recycling to further decarbonise by minimising aviation's material footprint.
- **Unleash regulatory toolboxes:** Allow the use of regulatory toolboxes to unlock European innovation potential while reducing administrative burdens.
- **Involve aerospace authorities:** Enable aerospace regulatory bodies (EASA, EDA, ESA) to participate in European Chemicals Agency (ECHA) consultations as sectoral authorities.

#### **Social implications and Just Transition:**

- **Address the social impact of regulatory policies:** Recognise and address the socio-economic implications of policies related to critical raw materials, deforestation, and renewable energy.
- **Mitigate the socio-economic impacts of transition:** Support regions and workers affected by industrial shifts through the **Just Transition Mechanism**. Accompany decarbonisation policies with investment and incentive measures to ensure a resilient supply chain transition:
  - **Reduce compliance complexity for SMEs and suppliers** to prevent economic strain and social risks.
  - **Incorporate social support mechanisms** into existing regulations to foster workforce development, community engagement, and fair labour practices in the aerospace supply chain.
  - **Promote public-private partnerships** to offer co-investment opportunities for companies adopting sustainable supply chain practices, fostering social equity.