ERA feedback on EU Tourism Strategy



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ERA is the trade association representing more than 50 airlines and over 150 associate members, including manufacturers, airports, suppliers and aviation service providers. ERA's airline members provide vital connectivity and support for Europe's regions, promoting social and territorial equality and cohesion as well as economic growth.

Regional aviation is key for essential connectivity which drives local economic development and contributes to tourism. Overall, tourism enabled by regional aviation supported 4.5 million jobs and €205bn in GVA in 2023 across Europe¹. Some touristic destinations rely almost entirely on air for tourism arrival (e.g. Azores, the Canary Islands or Madeira with up to 100% of tourists arriving by air).

However, sustainable, resilient and competitive EU tourism can only be achieved through enabling the decarbonisation of regional aviation while ensuring that regional airlines remain competitive.

ERA airline members are fully committed to supporting a transition to a more sustainable future for aviation and, ultimately, sustainable tourism. Regional aviation will play an essential role in the decarbonisation of air transport, as set out in the Destination 2050 roadmap², by enabling the use of Sustainable Aviation Fuels (SAF) in order to reduce CO2 levels with existing fleets, and at the same time being at the forefront of fleet renewal with radical new technologies³. Regional airlines will be the first movers in commercial aviation when it comes to implementing new technologies, notably with new methods of propulsion which are more suitable for shorter distances, including to access remote touristic destinations.

However, achieving a successful and competitive energy transition requires strong policy actions as well as ambitious industrial and funding policies to support and protect regional airlines which have lower revenue per passenger. Emissions reduction should be addressed through targeted financial measures notably by using revenues from the EU Emissions Trading System (EU ETS). Overall, funding applications should be made easier and more accessible to regional actors, and, more importantly, such funds should strategically combine with national funds to create maximum benefits. In the private sector, investing in aviation technology is today totally unclear and many are reluctant to invest. This is why we need strong initiatives by financial actors to finance the scale-up of new technologies, as well as further involvement in aviation by institutions such as the European Investment Bank (EIB).

European airlines operate in a highly competitive market, where unilateral regulatory costs have significantly increased the cost of flying. According to the Draghi Report on competitiveness, decarbonising aviation could cost up to €61 billion annually between 2031 and 2050⁴, which will place a heavy financial burden on the EU aviation sector, especially on those who operate with low margins. The EU should refrain from adopting measures that place a disproportionate financial burden on regional airlines. This would not only undermine their competitiveness but also risk higher prices for consumers, traffic diversion, carbon relocation, and reduced attractiveness of the EU as a tourist destination.

While aviation is essential for tourism, flight bans risk distorting competition and reducing connectivity, especially on regional routes where new, green aircraft would be deployed first. Similarly, ERA supports the development of multimodal travel which can have a positive impact on the development of tourism. However, any obligation for air operators to provide full content access to digital platforms could deprive airlines of their negotiation powers and oversight of their partners' level of consumer protection. Finally,



¹ Oxera commissioned by ERA, <u>Study on the economic, social and environmental value of regional airlines in Europe</u>, February 2025

² Destination 2050, <u>A route to net-zero European Aviation</u>, February 2025

³ As covered in Destination 2050, A route to net-zero European Aviation, Aircraft and Engine Technology and Alternative Fuels and Sustainable Energy will respectively represent 27% and 56% of the decarbonisation pathway.

⁴ Mario Draghi, <u>The Draghi report on EU competitiveness</u>, September 2024

no additional taxes should be imposed on the aviation sector (e.g. aviation fuel tax) at a time where significant investments are already required for the energy transition.

