

# Think Regional!



**Connectivity, prosperity  
and net zero aviation**



## Our members

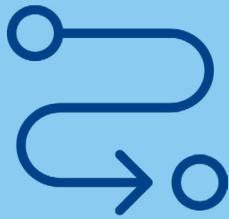
**1,000,000**  
flights per year



Using a fleet of  
**677**  
passenger aircraft  
**151**  
cargo aircraft



ERA members include  
**55** airlines  
and over **140** other  
industry companies



Operate **2,950** routes

**58%** jet aircraft  
**42%** prop aircraft

**88** seats average  
seating capacity



ERA members  
employ more than  
**480,000** staff

Carrying **>76 million** passengers per year



Source: Cirium

## ERA airline members



# Connectivity, prosperity and net zero aviation

**Air connectivity is essential to ensure equal opportunities to all European citizens regardless of their territories, developing regional economies and local communities.** Regional airlines provide air services to all territories of Europe, both for passengers and cargo.

Regional connectivity is at the core of the association's work. ERA's member airlines provide vital links and support to Europe's regions, promoting social and territorial equality and cohesion as well as contributing to increased business development, tourism, investment and job creation.

**Supporting a competitive and sustainable aviation sector and the implementation of the regulations from the Sustainable and Smart Mobility Strategy should be the focus** for the new political cycle, to ensure environmental and social sustainability objectives are met.

**The decarbonisation of air transport is a huge task and one of the most exciting challenges of the century that is scientifically possible. The aviation industry is committed to become net zero by 2050,** as laid out in the Destination 2050 roadmap. ERA members are embracing the implementation of all four pillars: use of Sustainable Aviation Fuels (SAFs), technological improvements, economic measures and airspace efficiencies.

**Enabling the use of SAF in existing fleets** is a key priority, but whilst the production of SAFs ramps up to a level where it becomes widely

available, **short-haul routes**, many of which are operated by regional airlines, **will be the first to implement technological zero-emission solutions, including the next generation of aircraft powered by new propulsion systems** such as hydrogen, hybrid–electric and full electric. This will happen before 2030 somewhere in the world and therefore, it matters to the EU's global industrial competitiveness and the Green Deal goals, as well as the long-term business models for regional airlines, that the EU represents an attractive place for early adoption.

**Regional airlines cannot be left behind and their specificities must be considered to ensure European citizens continue to enjoy the freedom to fly and access to goods and services even in remote destinations, at affordable prices.**

European Regions Airline Association (ERA)'s members, comprising over 50 European airlines and more than 170 other industry companies from the entire spectrum of aviation, represent a substantial component of European air transport, contributing hugely to economic growth within Europe by operating 1m flights on 2,950 routes and carrying more than 76 million passengers per annum as well as thousands of tons of cargo.

**ERA's members remain committed to work with the European institutions in the new political cycle to ensure preserving the European Single Aviation Market whilst continuing the path of decarbonising our sector.**

## Our contribution and policy asks

### ERA GIVES

Regional air connectivity is essential for the survival of local economies and provides social and economic links between the regions and mainland. Small and medium-sized enterprises rely on air transport to ensure full access to the European Single Market (ESM). Regional air links also provide equal opportunities and access to social services for citizens living in remote regions, including outermost and peripheral territories.

Regional connectivity is at the core of the association's work. ERA's member airlines provide vital connectivity and support to Europe's regions, promoting social and territorial equality and cohesion as well as contributing to increased business development, tourism, investment and job creation.

Made of over 50 European airlines and around 170 other industry companies from the entire spectrum of aviation, ERA members represent a substantial component of European air transport, contributing hugely to economic growth within Europe by operating 850,000 million flights on 1,500 routes and carrying more than 52 million passengers per annum and thousands of tons of cargo. ERA will continue to promote this work through its advocacy activities and industry events.

ERA's vision is to promote and defend the airline industry in providing safe and sustainable air connectivity to all regions of Europe, being the voice of our sector, representing the interests of our members and advocating to ensure a fit for purpose regulatory environment. To accomplish its mission, ERA works on each of these pillars:

- Promoting the unique contribution of the European regional airline sector in protecting and developing regional economies and local communities.
- Promoting social responsibility and environmental sustainability through advocating for the implementation of robust governance principles.
- Campaigning for continuous improvement in air safety and efficiency by collaborating with aviation safety and traffic management authorities.
- Enabling collaboration among members by providing co-operative business opportunities, focus groups and networking platforms while debating issues impacting our industry and joining our resources for the common good.

### ERA ASKS

The pivotal asks for ERA are set around the association's strategic pillars.



# 1

## To boost regional air connectivity

ERA airline members need an effective and stable European Union (EU) regulatory framework to ensure proper connectivity in all European regions both for freight and passenger traffic, at the same time as fostering the sector's sustainability. Whilst production of SAFs ramps up to a level where it becomes widely available, short-haul routes, many of which are operated by European regional airlines, will be the first to implement technological zero-emission solutions, including the next generation of aircraft powered by new propulsion systems such as hydrogen, hybrid-electric and full electric.

Thin and Public Service Obligation (PSO) routes operated by ERA member airlines play a significant and positive role in terms of connectivity, especially for communities in remote areas which often do not have direct access to essential social services, such as healthcare and education and therefore rely on connecting with large, populated centres. Maintaining these essential routes is vital for the regions but also for the future viability of regional airlines and the connectivity and services they provide.

Although not the only tool to support essential air connectivity, the current PSO framework is critical to ensure continuity of those routes that would not be economically viable to operate under normal market conditions. However, the current framework will need to be reformed to adequately support the long-term development of all European regions.

### POLICY ASKS

- ERA calls on the European Commission (EC) to proceed with the revision of the EU Air Services Regulation No. 1008/2008, and in particular the PSO framework to ensure more flexibility and creation of new routes.
- We strongly believe in reinforcing the voice of regional authorities in the decision-making process, given their principal interest. The revision should provide the regulatory tools to improve the process, in its form and in its contents, with aspects such as the introduction of a standard and harmonised procedures (also in English) for PSO bidders at EU level, and to introduce greater flexibility regarding the duration of PSO contracts, in order to allow predictability with regard to investment in fleet renewal and to cover the related costs. In times of unforeseeable crisis or force majeure, the regulation should allow airlines to renegotiate contracts for the remaining period to ensure that the operator can cover its additional costs as well as those arising from the implementation of new EU regulations. It should also revisit passenger rights legislation, EU Regulation No. 261/2004, for PSOs.
- At the same time, regional airline financing should benefit from wider interpretation, where innovative business models, such as those with public and private regional support, should be more easily accepted so that they can expand at EU level. This is particularly important to give regional airlines more financial power to follow their pathway to new technologies, as well as maintaining adequate essential connectivity between the regions.
- Modelling the environmental criteria in the PSO framework and going further by having a dedicated PSO structure for new aircraft technologies on thin routes of less than 500km. These could be funded PSO routes with the use of EU Emissions Trading System (EU ETS)-generated revenue from aviation, via organised tenders by Member States and/or EU regions.

# 2

## To ensure the competitiveness of European regional aviation

Boosting regional connectivity goes hand in hand with ensuring the competitiveness of regional aviation in Europe. ERA is focused on maintaining fair competition within the airline industry, to preserve the integrity of the European Single Aviation Market.

### POLICY ASKS

- Urgently proceed with the revision of EU Regulation No. 261/2004 governing air passenger rights (EU261) on the basis of the 2013 proposal, to create a level playing field for consumers and airlines and to address its disproportionate costs.
- EU261 bears disproportionately on regional airlines by imposing a cost per passenger that is almost twice as high as that for other airlines. These costs result in cancelled routes, render new services uneconomic and negatively impact the financial viability of regional operators and has also been shown to have implications on safety.
- In this respect, ERA will continue its advocacy work in extending the compensation time threshold to five hours to allow airlines to perform all the necessary operational, technical and safety activities required in the event of a disruption, obtain clarity regarding the definition of extraordinary circumstances and establish common passenger rights covering all modes of transport.
- Ensure fair competition and access for all airlines, regardless of their size, to all major European airports, for the sake of regional connectivity. The future revisions of the EU Slots Regulation No. 95/93 and the Airport Charges Directive 2009/12/EC must ensure connecting traffic for regional airlines, to avoid airports discriminating against airlines based on the size of aircraft.
- Develop specific measures at EU level to prevent uncompetitive and unfair practices like ‘price dumping’ which damage the competitiveness of regional airlines within the ESM.
- Ensure fair conditions in air ticket distribution by guaranteeing that Global Distribution Systems (GDSs), metasearch engines and intermediary ticket vendors do not discriminate against airlines, in particular smaller operators. In this respect, the neutral display principle, which is at the core of the Computerised Reservation Systems (CRS) Code of Conduct, must be safeguarded in any future legislative initiative as it constitutes a powerful tool to correct market failures resulting from advantageous competitive position while ensuring fair competition in the air travel market, as well as full transparency to allow customers to make an informed choice.
- Ease border controls: the implementation of the Entry Exit System (EES) should ensure it gives airlines, airports and EU and national authorities the opportunity to resolve technical issues and ensure the system is fully tested. This system will come on top of other border control measures such as Advanced Passenger Information and Passenger Name Records.

# 3

## To champion environmental and social responsibilities of regional aviation

ERA airline members are fully committed to supporting a transition to a more sustainable future for aviation. Regional aviation will play an essential role in the decarbonisation of air transport as set out in the Destination 2050 roadmap. These airlines will be the first movers in commercial aviation when it comes to implementing new technologies, notably with new methods of propulsion. The required investment is however considerable, especially when considering that regional airlines have the lowest revenue per passenger. The regional ecosystem must therefore be carefully protected and supported to make this energy transition a success.

Regional aviation has a clear path ahead, by enabling the use of SAFs in order to reduce CO<sub>2</sub> levels with existing fleets, and at the same time being at the forefront of fleet renewal with radical new technologies. Both pillars are necessary to reach sustainability objectives, and both need strong policy actions as well as ambitious industrial and funding policies in the next mandate of the EU institutions.

Some Member States have started a process to ban short-haul flights and we strongly believe this practice will harm the decarbonisation of the industry in the long run, as it will impact primarily the routes operated by regional airlines, where new green aircraft are to be first deployed, in addition to saving very little CO<sub>2</sub> emissions.

Regional airlines are facing a paradox; whilst they will be at the forefront of reaching net zero in-flight emissions by 2050, they could be significantly financially affected by various regulations which aim to make flying more expensive. In addition, funding from the private and public sector may not be directed in an efficient manner – for instance investment in electric vertical take-off and landing aircraft (eVTOLs) is currently seven times higher than in SAFs, despite still not a single eVTOL having yet been certified for commercial operations.

We need EU funds and single market policies to support this energy transition in the regional sector. 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 involvement in aviation by institutions such as the European Investment Bank (EIB).

Decarbonisation is not the only dimension of sustainability, and the social aspect of connectivity and growth of the regions should also be taken into account. Europe thrives on connectivity and numerous regions are dependent on these flight connections, which cannot be easily replaced by other modes of transport. The sector is also currently struggling with attracting and retaining the talent needed to be able to deliver its societal and environmental commitments.

## ERA ASKS

- Ensure SAF access at regional airports. The ReFuelEU Aviation initiative will certainly provide a regulatory incentive for the use of SAF but must ensure all airlines have actual access to SAF at any airport avoiding monopolistic situations, and without being subject to additional charges.
- Continue to expand the implementation of the SAF allowances mechanism as part of the EU ETS aviation and continuously increase the amount of allowances available for airlines until reasonable SAF prices are reached. Such a mechanism provides an additional incentive for airlines to decarbonise with the use of SAF and is a powerful answer to third-country initiatives such as the Inflation Reduction Act in the US, including minimum blend mandates, and would help airlines to bear the costs arising from the EU ETS.
- Do not proceed with the establishment of a kerosene tax under the current revision of the Energy Taxation Directive. Such a tax will come at the worst time possible, where significant investment is needed for the energy transition, and such levies take away finance required to achieve the aviation industry's sustainability objectives. Additionally, even if a tax increases prices and thus reduces demand, it will not encourage passengers to travel less, but rather divert traffic to non-EU countries to the detriment of Europe's tourism.
- Ensure financial incentives and investment channelling for fleet renewal (tools addressed as part of the Net Zero Industry Act; the role of the EIB, use of the Innovation Fund and others) as well as EU support for regional airports and airlines to renew their fleet with low-carbon technologies.
- Continue working collaboratively with EU social dialogue platform partners under the co-ordination of the EC, to promote and address the shortage of skilled workers within the regional aviation sector and to attract the younger generation during these exciting times for our industry.



# 4

## To promote and co-ordinate air safety, operational efficiency and ATM modernisation

ERA works with the European Union Aviation Safety Agency (EASA) and EUROCONTROL to ensure the specificities of the regional sector are taken into consideration when it comes to safety and operational procedures.

The new EASA leadership is an opportunity to build and extend our co-operation and co-ordination, providing a platform for the main issues affecting the regional and cargo sector to be highlighted and discussed. At a working level, new rules of procedure were implemented aiming to provide stakeholders with a stronger voice but place an additional burden on already limited resources. With a new Executive Director there is a commitment to build a stronger stakeholder relationship and ERA is looking forward to engaging on the specific issues through the Stakeholder Advisory Body and bilaterally with the relevant technical services.

The environmental label is a relevant example. ERA has been successful in its lobbying for the sole metric (revenue seat kilometres) in the pilot phase to be supplemented by several other metrics and data points ensures that regional business models are not adversely impacted.

ERA had been advocating for an ambitious regulatory framework that enables both a cost-effective and fuel-efficient airspace, providing benefits and in support of the EU Green Deal and the Destination 2050 targets. Disappointingly, after three and half years of negotiations, the content of the Single European Sky recast proposal was finally agreed and it fails to deliver any of the significant reforms that ERA had pushed for as well as representing a significant watering down of the initial proposal put forward by the European Commission in 2020. With national interests protected, achieving a truly seamless SES unfortunately seems further away than ever.

Against that backdrop, ERA is stepping up efforts to deliver efficiencies both in the near term and in the context of research and development. Close co-ordination with EUROCONTROL continues at all levels. On route charges, some long-haul carriers are promoting reform which carries significant risk for regional aircraft with proposals being put forward being particularly punitive.

On capacity, environment and cost effectiveness, ERA is represented on fora such as the Provisional Council, the Network Management Board, Air Navigation Services Board and Network Directors of Operations and technical subgroups. On AirTraffic Management research and development, ERA has committed expertise to the SESAR Joint Undertaking in support of trajectory-based operations, environmental industrial research projects and validation exercises for mature SESAR solutions. ERA is also working closely with the SESAR Deployment Manager with regards to Common Project 1 deliverables, including the deployment of Flight and Flow Information for a Collaborative Environment (FF-ICE) Release 1 from 1 January 2026.

## ERA ASKS

Establish a dedicated ERA liaison role embedded within the EASA stakeholder office.

- With Article 5 of the RefuelEU regulation, placing an obligation on aircraft operators to uplift at least 90 per cent of the year's aviation fuel required at the departing EU airport, ERA is working closely with members and the EC and EASA to mitigate any operational and safety impacts. We are urging for measured and proportional exemption guidelines and criteria to be established ahead of implementation on 1 January 2025, advocating for a wider exclusion of turboprop criteria whilst respecting the basis of a level playing field.
- A measured and proportionate deployment of FF-ICE at EU level, with harmonised implementation across all affected stakeholders ensuring that regional airlines can benefit from the new flight planning methods.
- For cybersecurity, Part IS and associated aviation security workstreams, ensure that synergies across the different regulatory packages are identified and all efforts are made to identify harmonisation opportunities and reduce complexity for regional operators given the ever-evolving landscape.
- With skills and experience shortages in the regional pilot workforce, and several states outside of Europe allowing pilots to operate beyond the current European threshold age of 65, expedite a European Plan for Aviation Safety (EPAS) research task on the raising of pilot medical license to be extended to age 67, identifying the steps and mitigation that are required to ensure continued safe operations.
- Establish an EPAS project aiming to understand and explore the impacts and possible links between on safety/human factors and EU261.
- Continue to push for operational and technical deliverables outside of the SES recast package for airspace improvement that deliver tangible operational and environmental benefits for member airlines.
- Ensure that the proposed targets for the 4th Reference Period of the current SES Performance Scheme are not watered down, providing regional airlines with improved capacity (reduction in ATM attributable delay), cost efficiencies and CO<sub>2</sub> emissions reduction through more optimal trajectories.

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