

## Response to the EU Consultation on revision of the State aid in the aviation sector; Commission guidelines on airports and airlines

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### BACKGROUND INFORMATION

The following document presents the response of the CPMR to [the public consultation held by the European Commission](#) until 5 March 2025 concerning the future revision of State aid in the aviation sector – Commission [guidelines on airports and airlines](#).

The Commission guidelines on airports and airlines aim to ensure fair competition and prevent market distortions in the aviation sector. They set rules on state aid for airport infrastructure and airline operations, balancing economic growth with public interest. The guidelines promote efficient use of resources while ensuring compliance with EU state aid rules.

The contribution from the CPMR General Secretariat below is based on previous Technical Notes, the CPMR's "[Response to the Commission's consultation relating to the provisions to simplify the implementation of unproblematic state aid for ports and airports](#)" as well as feedback and contributions from the member regions of the Transport working group.

The CPMR encourages its member regions to respond to the consultation, using the key points outlined in this note as a reference.



**The consultation is structured in six parts, including multiple-choice answers and open-ended responses.**

**Only the questions directly referring to CPMR positions are answered and shown below.**

## **A- general issue and importance of Regional Airports**

### **1. To what extent do regional airports contribute to:**

- **Regional connectivity:** Significantly
- **Regional economic development:** Significantly
- **Combatting traffic congestion of major EU hub airports:** Significantly

#### **Comment:**

The CPMR considers the forms of aid described in the Aviation Guidelines to be useful instruments to facilitate regional development but not necessarily sufficient to ensure it. Connectivity remains a major issue for several peripheral and maritime regions, particularly in outermost, island regions, and sparsely populated areas, some of which lack any road or rail connections to the mainland. Moreover, regional airports do not only play a vital economic role for the territories, but they can also contribute to reducing air traffic congestion at major hubs that are nearing maximum capacity and promoting social and territorial equality.

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## **B- Operating aid to regional airports**

### **5. based on your experience, do you think that operating aid as an instrument will still be necessary after the end of the transitional period in 2027?**

- **Yes**

#### **Comment:**

The CPMR believes that the transitional period during which airports can receive operating aid should be extended and include airports handling up to 5 million passenger per year. Regional airports are important to ensure and support connectivity and the development of regions. The smaller regional airports are unlikely to achieve financial independence without continued support, making operating aid a crucial tool to sustain their role, additionally, new regional airports not identified today could also benefit from such aid. However, market trends might jeopardise their -already fragile- economic viability, as most are still loss-making. For instance, the consolidation process of the airline industry that has reduced the number of competitors, the increasing focus of low-cost carriers on major airports and the economic uncertainty are elements that negatively impact the operating activities of regional airports. Therefore, operating aid should be further extended to ensure connectivity and development of the regions.



## C- Investment aid to airports

### 8. Do you think that investment aid under the Aviation Guidelines is still necessary?

- Yes

#### Comment:

State aid thresholds and eligibility criteria must address market realities and include an approach that allows for adaptation to the specificities of regional areas. The CPMR believes the categorisation and aid intensity as to be appropriate, given the following exceptions (although direct experiences from the member regions would provide better guidance) in the Guidelines:

- For airports located in remote regions (irrespective of their size) the maximum aid intensities for investment aid to finance airport infrastructure may be increased by up to 20%.
- For airports < 1 million passengers per annum located in a peripheral region: aid intensity may exceed 75% in exceptional circumstances subject to case-by-case assessment.
- In case of relocation: proportionality, necessity and maximum aid intensity will be assessed regardless of average traffic.
- For airports over 5 million passengers per annum: only under very exceptional circumstances, characterised by a clear market failure and taking into account the magnitude of the investment and the competition distortions.

Furthermore, unforeseen external factors such as the Russian airspace closure as a result of the Russian aggression in Ukraine, or natural disasters, should be taken into account. In these cases, the investment aid could be tied to certain time period.

Investment costs that address the needs and maintenance of infrastructures serving essential public service missions (such as civil protection, firefighting services, or sanitary evacuation and medical transportation for remote areas) and/or dual-use (civil-military) purposes should be excluded.

The future guidelines should make it easier to invest in maintaining and bringing airports up to standard, as required by the EASA.

### 9. Should the Aviation Guidelines include a specific set of investment aid provisions for regional airports in very remote regions of the EU, such as the outermost regions?

- Yes

#### Comment:

*Refer to the previous response.*

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## D- Star-up to airlines

### 10. Do you think that start-up aid is still necessary?

· Yes

(Comment in the response to question 11)

### 11. Given that the aviation sector is fully and successfully liberalised, do you think that the possibility to assign public service obligations to specific routes under Regulation (EC) No 1008/2008 would be sufficient to address remaining air connectivity issues (i.e., even if start-up aid were to be discontinued)?

#### Comment:

The commission highlighted the need to clarify and simplify the provisions for start-up aid for airlines, as they are rarely used in practice. However, this type of aid is crucial for the development of new routes in peripheral regions, for ensuring their connectivity and economic development. It is essential to address the challenges and limitations that hinder the use of these aids.

The limitation of Start-up aid covering up to 50 % of airport charges in respect of a route for a maximum period of three years, should be revised within the objective of achieving the commercial profitability of the route, giving the time required for a new route to become profitable, flexibility in the types of eligible costs and considering the seasonality of the traffic.

The CRPM supports the principle of maintaining start-up aid over time and the need to establish a new regional approach to this scheme. Start-up aid is necessary especially for airports in the remote part of the EU, as without such aid it would be problematic for those regions to set-up such service.



## E- Greening of Aviation

**17. Should some form of green conditionality of State aid be introduced in the Aviation Guidelines to incentive airports to adopt sustainable practices (e.g., the use of alternative fuels, energy-efficient technologies, and waste reduction strategies)?**

- Yes

### **Comment:**

The CPMR believes that the rules in the Aviation Guidelines adequately take into account the environmental and climate impact of airports, as aid must be compatible with EU legislation and avoid environmental harm.

However, specific provisions linking investment aid to airports and operating aid to airlines (with higher aid intensity) to the greening of the aviation sector could be introduced and specifically the costs associated to investments that meet regulatory requirements.

As far as regional airports are concerned, we think any public aid needed to bring infrastructure up to environmental standards and for the energy transition of airports (e.g. energy renovation of buildings) should be fully exempted. In addition, public aid to produce sustainable aviation fuels, and any other factor contributing to the decarbonisation of the sector, should be subject to specific exemptions. These investments are not capacity ones. Public support for decarbonisation should be subject to higher subsidies (thresholds, intensity) with the aim of encouraging the sector to decarbonise.

The introduction of specific provisions – to be extended also to airports with more than 5 million passengers per year – with higher aid intensity, which would link investment aid to airports to green investments in infrastructure or the use of renewables, could be beneficial in reducing the environmental and climate impact of airports. Furthermore, it could lead to the development of pilot projects that could be reproduced on a larger scale.

Similarly, the introduction of specific provisions for operating aid to airlines, where airlines use sustainable aviation fuel, could reduce the carbon footprint of aviation and stimulate the use of greener fuels.

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## F- Other points

**23. When assessing the compatibility of aid measures, the Aviation Guidelines stipulate that such measures should not lead to a duplication of unprofitable airports or additional, unused capacity. To assess that, the Aviation Guidelines take into account existing airports within the defined ‘catchment area’. The Fitness Check, however indicated that such duplication of unprofitable airports or creation of unused capacity only occurred in limited instances. Against that background, to what extent is the duplication of unprofitable airports and creation of unused capacity still an issue in today’s market environment?**

### **Comment:**

The CPMR believes that special provisions should be introduced for investment and operating aid for airports belonging to a network of airports and managed by a single operator. By excluding airports in the same catchment area and managed by a single operator, there could be a negative impact on the development strategy of such airports. This applies particularly in outermost and island regions, sparsely populated areas, or in general, airports located in non-connected land.

**24. Do you consider the current approach and the definition of a ‘catchment area’ as contained in the current Aviation Guidelines still fit for purpose?**

- No

### **Comment:**

The CPMR considers it positive that the Guidelines state that the catchment area of an airport (the geographic market where airports compete intensively) varies based on its characteristics, including its location.

However, to take into account the characteristics of peripheral and maritime regions, the criterion of a distance of 100 km and 60 minutes should be reduced by half, to 50 km and 30 minutes. Furthermore, land discontinuities should be considered for those airports located in non-connected land. It can be considered that for a distance below 50 km on the same land mass, realistic alternatives are available for users.

Airport catchment areas in border regions of the EU must consider that economic and distance factors are not the only considerations in the airport selection process made by users (both freight and passengers). Even without border-crossing procedures, domestic preference is a key factor, making the definition of catchment areas in these types of territories more complex. This is why the catchment areas of airports in regions bordering both the internal and external borders of the EU must receive special consideration.



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The Conference of Peripheral Maritime Regions (CPMR) represents more than 150 regional authorities from 24 countries across Europe and beyond. Organised in Geographical Commissions, the CPMR works to ensure that a balanced territorial development is at the heart of the European Union and its policies.

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