

European Aviation Strategy – Crossroad for the future of European Aviation: a joint position of FNAM and BDL

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Aviation is a cornerstone of Europe's competitiveness, industrial strength and strategic autonomy. For the German and French aviation industry — a strong and globally competitive aviation sector is a strategic asset for Europe. Strong European hubs and airlines are essential to connect Europe with global markets. They support trade, tourism and investment, while also strengthening resilient value chains. Preserving Europe's attractiveness as a place to do business and invest therefore requires an aviation sector that can compete internationally and reinforce Europe's strategic resilience. At the same time, European aviation is under increasing pressure. High operating costs, complex and asymmetrical regulation, and major investment needs linked to climate neutrality are weakening the sector's international competitiveness. These challenges put connectivity at risk and are particularly concerning for Europe's export-oriented economy.

Consequently, the European aviation strategy must focus on reducing costs as well as bureaucratic and administrative burdens and securing a level playing field so that European aviation can fulfill its core mission: connecting Europe to the world.

We need:

1. Urgent review of existing regulation for a **competitive-neutral regulatory framework for climate protection in air transport, esp. the Fit-for-55 regulation.**
2. **Avoid over-regulation and additional burdens.** Limit new regulations to measures that are genuinely urgent.
3. Set the right framework conditions that **support the ramp-up of sustainable aviation fuels.**
4. Safeguard social cohesion and the **affordability of air travel.**

Advance climate action while maintaining a level playing field¹

FNAM and BDL welcome the European Commission's recognition of the hub leakage problem in the context of the ETS review, as well as the proposed extension of SAF allowances. At the same time, European airlines must not be exposed to additional unilateral cost burdens.

The scope of the EU ETS should therefore not be expanded — neither to flights of up to 5,000 kilometers nor to the full international scope. Such an extension would create additional costs and retaliatory risks for European airlines and, through additional competitive disadvantages, weaken their global position. Instead, the internationally recognized instrument CORSIA should be strengthened through all available diplomatic efforts, rather than being undermined by unilateral EU action. Only a coordinated global approach can effectively reduce emissions worldwide while maintaining a level playing field.

¹ See for concrete solutions the BDL and FNAM Steer Report on the Further Development of "Fit for 55": [Fit-for-55-mitigation-measures-report-final Seite 01.jpg \(1654×2339\)](#)

SAF allowances must also work in practice. FNAM and BDL welcome their extension to 2040 and the additional 110 million SAF allowances. However, the framework should go further: allowances should apply to all departures and remain open to all certified SAF, regardless of where it is produced, rather than being limited to SAF produced within the EEA. Support for HEFA-SAF should also be extended beyond 2029 to avoid a costly gap as blending quotas increase.

Support the ramp-up for sustainable aviation fuels without distorting competition

The availability of sufficient quantities of SAF and eSAF at competitive prices is crucial for the decarbonisation of air transport, as aviation currently has no viable alternative to SAF. However, SAF is still significantly more expensive than conventional jet fuel and is not available in sufficient quantities. The EU blending mandate increases demand without ensuring a corresponding expansion of supply. Political measures and long-term investment certainty are therefore needed to support the scaling-up of SAF production to an industrial level. In addition to building up a European SAF infrastructure, efforts should also focus on increasing the flexibility of the SAF market. An ambitious book & claim is to be supported. To provide investment certainty, we support maintaining the current **ReFuelEU Aviation quotas**. The PtL mandate must be set at a level that reflects actual market availability and remains achievable in practice. Additional compliance options should be introduced where needed to provide flexibility and prevent unintended competitive distortions. Furthermore, the measures adopted by the **Working Group on SAF within the Working Group on Climate-Neutral Aviation** should be implemented.

Safeguard social cohesion and the affordability of air travel

Avoid further regulatory measures that unnecessarily and unilaterally increase the cost of air travel for EU airlines. New mandatory requirements on airlines, including those relating to hand luggage, seating or additional passenger services, should be carefully assessed for their cost impact and proportionality.

Reduce drastically administrative burdens and regulatory overcomplexity

Europe needs a high-performing, innovation-friendly and competitive regulatory framework for air transport. In practice, however, increasingly complex, fragmented and insufficiently coordinated rules are creating significant barriers for companies. Reporting obligations, lengthy approval and certification procedures, overlapping regulations and duplicative requirements generate substantial administrative costs and tie up resources that are urgently needed for investment, innovation and transformation.

Against the backdrop of major investment needs, intensifying international competition and the urgent transition towards climate neutrality, cutting bureaucracy is a critical lever for strengthening Europe's competitiveness. It can also accelerate the deployment of new propulsion technologies, alternative fuels and digital solutions.

The European Aviation Strategy and the planned Transport Omnibus must seize this opportunity to reduce administrative burdens substantially, facilitate operations (ATC, border management) and address regulatory overcomplexity at its root, rather than limiting itself to marginal improvements. It should remove unnecessary reporting and documentation requirements, eliminate overlapping and duplicative rules, reduce fragmented implementation and simplify burdensome administrative and certification procedures. A decisive reduction in administrative complexity is essential to free up resources for investment, innovation and transformation — and to ensure that European aviation can compete effectively in global markets.

The European Aviation Strategy must set a vision for European aviation for the next decade(s) and must pave the way for reaching this goal.