

Brussels, 18 November 2024

### European Commission

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Ms Teresa Ribera Rodríguez	Executive Vice President designate
Mr Stéphane Séjourné	Executive Vice President designate
Mr Raffaele Fitto	Executive Vice President designate
Mr Apostolos Tzitzikostas	Commissioner designate
Mr Andrius Kubilius	Commissioner designate
Mr Wopke Hoekstra	Commissioner designate
Mr Dan Jørgensen	Commissioner designate
Ms Ekaterina Zaharieva	Commissioner designate
Mr Piotr Serafin	Commissioner designate

### Member States

Ministers of Transport  
Ministers of Energy & Climate  
Ministers of Europe  
Ministers of Finance

### European Parliament

Ms Elissavet VOZEMBERG–VRIONIDI	TRAN Committee Chair
Mr Antonio DECARO	ENVI Committee Chair
Ms Anna Cavazzini	IMCO Committee Chair
Mr Borys BUDKA	ITRE Committee
Mr Adrian-Dragoş BENEA	REGI Committee
Mr Johan Van Overtveldt	BUDG Committee

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Ms Ilze Juhansone	Secretary General; European Commission
Ms Magda Kopczyńska	Director General; DG MOVE
Mr Kurt Vandenberghe	Director General; DG CLIMA
Ms Ditte Juul-Jørgensen	Director General; DG ENERGY
Mr Timo Pesonen	Director General; DG DEFIS
Mr Marc Lemaître	Director General; DG RTD
Ms Stephanie Riso	Director General; DG BUDGET



Industry alliance committed to  
climate neutral European aviation

## Sustainable & Competitive Aviation in the Clean Industrial Deal

Dear Commission President,  
Dear Commission Executive Vice President designates,  
Dear Commissioner designates,  
Dear Ministers,  
Dear Committee Chairs,

On behalf of the European Aviation Industry, we would like to express our sincere appreciation for your continued commitment to decarbonising European Aviation, particularly through the extensive legislation put in place under the European Green Deal during the last legislative period.

**DESTINATION 2050** is the industry alliance committed to net-zero carbon emissions by 2050, representing all major 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, this alliance has developed the European Aviation Industry Roadmap, "A Route to Net Zero European Aviation"<sup>1</sup>, which we have been advancing since 2021.

This roadmap is currently undergoing a comprehensive review by two independent expert consultancies to incorporate the significant regulatory and technological advancements in aviation over the past few years. The reviewed Roadmap will serve as the strategic blueprint for decarbonising European aviation, ensuring continued alignment with the ambitious goals of the European Green Deal and the forthcoming Clean Industrial Deal.

As an industry and eco-system, we stand ready to continue being a proactive part of the solution. Therefore, we urge the European Commission to prioritise Aviation as a critical, hard-to-abate sector which plays an essential role for the competitive position and cohesion of our Union.

This requires:

- 1. The inclusion of aviation within the forthcoming Clean Industrial Deal, and**
- 2. A specific Aviation Industrial Strategy that integrates the key recommendations from the Draghi report.**

The whole aviation sector is committed to reach net zero emissions for its operations by 2050 and working hard to progress towards this ambitious objective. But achieving the goal of net-zero carbon emission aviation is not something the industry can do on its own. It

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



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requires immediate, effective and fully aligned supportive policies at EU and national level aimed in particular at

- Accelerating research & development,
- Scaling up of the availability and uptake of affordable sustainable aviation fuels (SAF)
- Enhancing access to financing for low-carbon technologies.

**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. Therefore, in addition to the above, we are calling on the European Commission and Member States to engage with the European aviation industry through the DESTINATION 2050 founding partner initiative and **establish a structured, high-level dialogue at EU level.**

This high-level dialogue would ensure coherence, alignment and collaboration across all stakeholders and alliances, accelerating policy development and delivering the necessary instruments to decarbonise aviation effectively in terms of incentives and funding. We need a jointly agreed EU Aviation Industrial Strategy as part of the Clean Industrial Deal that fosters innovation, secures financing, provides regulatory certainty and consistency across policy initiatives to continue to build a sustainable and competitive European aviation sector that continues to underpin Europe's connectivity, economic growth and global 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



Tanja Grobotek  
CANSO Europe  
Director Europe Affairs



Montserrat Barriga  
ERA  
Director General



Annex: Aviation in the Clean Industrial Deal

## Aviation in the Clean Industrial Deal

The European aviation sector, represented by the five DESTINATION2050 partners, applauds the ongoing work to establish a Clean Industrial Deal that balances sustainability with competitiveness. We urge that key aviation-related elements of the Draghi report are integrated into this Deal.

The Clean Industrial Deal should specifically address the following aspects of aviation:

### 1. General recognitions

- **Hard-to-abate sector.** Aviation, by its nature, is a hard-to-abate sector with **stringent safety and technology requirements**. It faces unique challenges due to limited alternative propulsion technologies and the long development cycles necessary to bring innovations from research to market.
- **Societal and economic role.** Aviation is essential to the cohesion of the European Union, connecting islands, remote regions and mainland Europe, while offering equal cultural and economic opportunities. It plays a fundamental societal role, creating high-quality, skilled jobs, driving research and innovation, facilitating economic prosperity and freedom of movement, trade and cultural exchange.
- **Major economic driver.** Air transport contributed **9 million jobs and €606 billion to GDP** in the EU in 2023<sup>2</sup> (14 million jobs and €851 billion to GDP in Europe<sup>3</sup>). That is equivalent to 1 in every 25 jobs across the EU and 4% of all employment and 4.6% of all GDP in the EU. The sector is a significant contributor to the European economy and welfare of millions of families across the EU.
- **The price of net zero.** The decarbonisation of the aviation sector requires high investments estimated at a premium expenditure of 26 billion and total expenditure of 59 billion per year<sup>4</sup> (€61 billion a year according to the Draghi report). Therefore, keeping the competitiveness of the sector while ensuring its decarbonisation requires strong effective support and appropriate policies from the EU authorities.

### 2. Research and development

- **Innovation pipeline.** The European aviation sector has long been at the forefront of research, with a focus on safety, efficiency and sustainability. Over the past decade, significant advancements have been made, e.g. energy-saving technologies. Continued and accelerated investments are required to bring innovations to market to achieve the decarbonisation targets and to exploit the full potential of the emerging technologies.

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<sup>2</sup> [ACI EUROPE SYNOPSIS - BENEFITS OF AIRPORTS & AIR CONNECTIVITY](#)

<sup>3</sup> Europe i.e. EU, UK and EFTA

<sup>4</sup> [www.destination2050.eu - The-Price-of-Net-Zero-Report.pdf](#)

- **EU research funding.** It is imperative that **EU research funding remains consistent** (especially in the Clean Aviation & SESAR JU's) and that bureaucratic barriers are minimised to accelerate the innovation process.
- **Efficient cross-European coordination.** **National research budgets must be better coordinated** to avoid duplication and ensure funding is directed towards the most impactful projects. This will ensure the use of the needed resources for the most effective and scalable research initiatives.
- **Decarbonisation roadmap.** To achieve net-zero carbon aviation by 2050, the roadmap includes key pillars: **technological innovation** for further increased energy efficiency, the use of **sustainable aviation fuels, market based measures** (such as EU emissions trading schemes), and improving **air traffic management (ATM)** and **aircraft operations**. These measures collectively contribute to optimising the efficiency and sustainability of aviation.

### 3. Access to finance

- **Sustainable Transport Investment Plan.** As part of the Clean Industrial Deal, a dedicated Sustainable Transport Investment Plan is essential to identify measures that will effectively support the energy transition, including for aviation. This plan should boost investment in the production and supply of sustainable aviation fuels (SAF) and alternative fuels infrastructures.
- **Financing challenges.** Aviation's access to both public and private finance is crucial, covering everything from manufacturing to ground and flight operations. The lack of readily available risk capital in the EU poses significant challenges to the sector.
- **Public and private synergy.** Public financing plays a key role in supporting research and innovation, but it also has a vital role in **de-risking decarbonisation technologies**, thereby unlocking private capital for low-carbon aviation projects. Powerful industrial investment tools can be unlocked at EU level, notably with repayable advance schemes or venture debt funding
- **Improved coordination.** Coordination between **EU-level and national financing streams is essential** for maximising effectiveness.
- **Private capital investment.** In Europe, much of the private capital is held by financial institutions and pension funds, which are often restricted from investing in aviation due to concerns around dual-use technologies or unclear sustainability classifications. Clear guidelines and de-risking mechanisms are needed to unlock these vital elements.

### 4. Sustainable energy and feedstocks

- **SAF availability.** SAF is critical to the decarbonisation of the aviation sector. Both bio-SAF and e-SAF production capacity must be prioritised, supported by incentivising

policies such as contracts for difference, SAF allowances within the EU Emissions Trading System (ETS) and other regulatory mechanisms to increase SAF supply across the EU, together with working at the international level on the interoperability of SAF standards in different regions.

- **Feedstock supply. Regulatory actions** must secure access to the necessary feedstocks for SAF production, both from domestic and international sources.
- **Technological readiness.** Europe's aviation ecosystem and infrastructure must be prepared for the adoption of new propulsion technologies, including hydrogen and electric-powered aircraft.
- **Carbon Capture and Storage (CCS).** Policies that incentivise carbon capture utilisation and storage technologies for aviation should be increased to enhance the sector's decarbonisation potential.
- **Alliances.** We welcome strengthening of the Alliance for Zero Emission Aviation (AZE) and the Renewable & Low Carbon Fuels Alliance (RLCF), which are both crucial in enabling this transition.

## 5. Sustainable competitiveness

- **Global leadership.** European aviation is one of the most competitive sectors globally, standing alongside the US in leadership. This position must be safeguarded by ensuring Europe also leads in sustainable aviation.
- **Regulatory framework.** A robust, forward-thinking regulatory framework is essential for maintaining a competitive aviation sector. Political commitment to supporting aviation's decarbonisation journey will help secure this leadership position.
- **Regulatory streamlining.** The regulatory burden for aerospace must be streamlined to support the industry's transition e.g. REACH and the Eco-design for Sustainable Products (ESPR) should account for aviation's unique safety and airworthiness standards, long product life cycles and complex global supply chains.
- **Securing the supply chain.** To secure the entry into service of low-carbon technologies, the aviation industrial strategy should include actions that serve the aeronautics supply chain from critical raw materials supply to the dismantling of end-of-life aircrafts.

## Conclusion

Aviation plays a critical role in Europe's economic and social fabric, making it vital that the sector's specific challenges and contributions are fully integrated into the Clean Industrial Deal. By fostering collaboration, ensuring access to finance, and supporting technological innovation, Europe can maintain its global leadership in aviation whilst achieving its ambitious decarbonisation goals.