NOTE TO EDITORS

EBAA comments on T&E report recommendations

European Business aviation is a dynamic sector that fosters technical innovation and sustainability improvements across the full value chain, from manufacturers to operators. Business aviation is a lifeline for communities, be it for medical transport or as a tool to help governments and businesses generate local economic development.

- Business aviation represents 8% of European aviation traffic.
- The global aviation industry produces around 2% of all man-made CO_2 emissions. Business aviation accounts for 2% of those air transport emissions.
- Business aviation employs 374,000 people in Europe (directly and indirectly) and generates 87 billion euros in economic output annually.
- Business aviation connects 1,400 European airports, of which 900 are connected by business aviation operators only.
- Business aviation operates 70 life-saving or medical flights per day (on average).

Source: https://www.ebaa.org/about-business-aviation/

T&E recommendation: "By 2030, regulators should only permit the use of hydrogen or electric aircraft powered with green hydrogen and electricity for private jet flights under 1,000km within Europe."

Business Aviation is working to reduce its environmental impact in several ways, and cooperation between policymakers and the Business Aviation industry will deliver favourable results without the need for punitive measures that demonstrated their inability to address the challenges of yesterday, today, and tomorrow.

Our sector has always been an early adopter of innovative technology. As an example, amongst others, business aviation pioneered winglets for aircraft, which optimize aircraft performance and flight range, and contribute to a more efficient fuel burn, thereby reducing emissions. This equipment is now in place on most commercial aircraft. This represents a saving of billion gallons of jet fuel worldwide and a reduction of millions of tons in CO2 emissions yearly.

The Business Aviation Commitment on Climate Change is a key component of our strategy to meet the objectives of the EU Green Deal. It is a combination of goals and an aggressive programme to reduce Business Aviation's impact on climate change. It builds on carbon-neutral growth from 2020 and continuous improvement in fuel efficiency to achieve a reduction in total CO2 emissions, with SAF being a key element towards achieving this Commitment

Business Aviation aims to lead by example by increasing awareness and utilisation of SAF while working with producers and distributers of SAF across Europe and globally. Unlike hydrogen, SAF is a readily available technology in support of our commitment that is available today, even if it is in short supply as the sector ramps up its operations.

Hydrogen is a promising technology in its various forms and business aviation will use hydrogen aircraft when they will be on the market, but the technology will not be widely available in 2030 as many barriers persist, with the earliest introduction predicted for 2035 by Airbus with their ZEROe concept. For hydrogen technology to become a viable solution, the aviation industry requires a

redesign of much of its aircraft, from the propulsion system to fuel storage, advancements in light-weighting storage tanks and cryogenic cooling systems, to take advantage of hydrogen's high energy density; a significant ramp-up in "green" hydrogen and/or carbon capture and storage (CCS) to increase the share of emissions-free hydrogen production through the use of renewable energy to produce it; hydrogen infrastructure improvements in fuel delivery to airports and airport refuelling; and, a reduction in the price of production methods for "green" hydrogen to compete with kerosene on a cost basis. In addition to that, current knowledge indicates that hydrogen is only suitable for mid-range aircraft.

Other technologies and CO2 reduction methods and mechanisms are available, and we are working along the value chain with policymakers to increase their uptake.

Sustainable Aviation Fuel, electrification, operational improvements reducing fuel burn, carbon-neutral infrastructures, including airports, carbon offset, etc. are already used and their intensity is increasing year on year.

The business aviation industry has noted a consistent increase in the electrification of aircraft systems, research on electrical propulsion, and investments in electric or hybrid aircraft designs. Substituting jet fuel with electricity will have a notable impact on the climate change impacts of aviation, as the operation of electric aircraft will not be associated with CO2 emissions from fuel combustion.

Electrification or battery-powered aircraft is also a technology that would fit the general aviation sector very well, particularly from a sizing and distance point of view and the manufacturer Pipistrel Velis Electro has already gained certification for an aircraft configuration with an electric propulsion system with EASA, so is a viable and exciting technology for the sector going forward and will reduce operational noise and emissions.

Urban air mobility (UAM) will also have a "profound" impact on the future of business aviation, with eVTOL playing a fundamental role. EVTOLs will solve the 'last mile' or 'door-to-door' challenge by moving people quickly from a company office to meetings in city centres that are near to existing heliports or newly constructed vertiports, or to outlying airports so passengers can depart on a business aircraft or scheduled airline flight. Experts estimate that eVTOL and UAM will be in commercial operations as soon as 2025 although the path ahead still has several issues to resolve on the technological and regulatory fronts.

The business aviation value chain is working towards the technological solutions introduced in the T&E report. All the experts with the technical backgrounds required to provide a tentative timeline of technological advancements and implementation of those new technologies are working concretely on those technologies for aircraft manufacturers. All those experts can confirm that by 2030 hydrogen and electric aircraft adapted to business aviation needs will not be widely available or mainstream, which does not mean that they will not exist. The average lifespan of an aircraft is around 30 years, and this also needs to be considered when predicting the future.

T&E recommendation: "Until a ban is in place in 2030, a ticket and fuel tax should be imposed on fossil-fuel private jets, scaled with flight distance and aircraft weight".

First, freedom of movement and residence for persons in the EU is the cornerstone of Union citizenship. Secondly, the concept of freedom of choice, that is, the possibility, and the right, for customers, to choose freely the products/services best corresponding to their needs is at the core of European values and should not be questioned. Suggesting a ban on business aviation operators to

provide their essential or facultative services and their socio-economic contribution to the European society is unworthy of democracy grounded on the rule of law.

The business aviation sector pays its fair share and more and is not against taxation or environmental taxation as soon as the funds are used to finance our industry to meet the European Green Deal's ambitions.

It is widely misunderstood that aviation, and Business aviation does not pay taxes on its operations. The fiscal regime for Business aviation in Europe is highly fragmented, with many different taxes being applied differently in the various European Member States.

The business aviation industry works with policymakers to harmonise rulemaking in this area, business aviation operators comply with different taxation rules.

Several EU-wide taxes affect aviation and in particular Business aviation. In addition, certain European Member States impose taxes at the national level. Italy's Aerotaxi Passengers tax and the various implementations of the Energy Taxation Directive are two examples.

In addition to that, as confirmed in the European Green Deal, the European Commission will propose to revise the Energy Taxation Directive, focusing on environmental issues. The current directive includes a mandatory exemption for the taxation of energy products used in international aviation. The directive, however, already allows Member States to limit this exemption and apply the tax on fuels used for domestic flights unilaterally and intra-EU flights if a bilateral agreement is concluded between the Member States concerned.

The aviation sector including business aviation is also the only one to entirely finance its infrastructure, business aviation companies are paying their corporate taxes as well as dozens of others like all actors of the European economy.

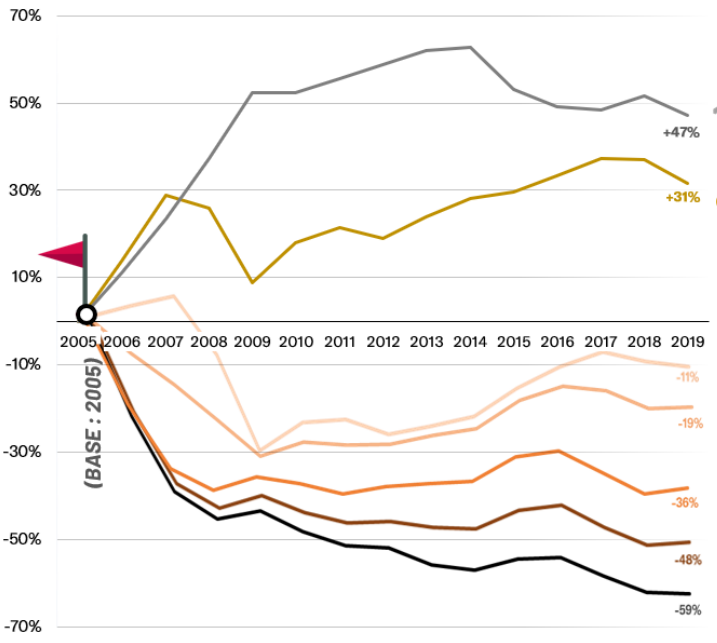
T&E recommendation: "Pending the development of these new technologies, companies and individuals should commit to a substantial reduction in private jet use."

The demand and the need to use a business aircraft so companies, governments, individuals, emergency & medical services can undertake their missions and travels will not disappear. Eliminating this need cannot be decreed or imposed.

One of the main reasons is that we fly where others do not. Business aviation is a specialised travel solution and investment strategy, enabling people to meet face-to-face when time matters most. It allows users to have full control over their schedule and travel to at least three times more destinations in Europe than airlines – many of which are not served by other forms of air travel. This leads to productivity gains, whilst also connecting communities in remote places, boosting their economic growth in the process.

In addition to that, the various companies of the business aviation value chain, from manufacturers to business aviation terminals are investing billions of euros to modernise their fleet, their infrastructures, etc. Those investments are feeding business aviation R&D. The aircraft of tomorrow are being designed today and in the real world only profitable companies can invest in their future. The electric cars that are becoming mainstream today are now a reality because massive investments decisions were taken by profitable companies and investors. Business aviation is financing its revolution, but it will not finance itself through substantive reductions.

The business aviation sector is reducing its relative footprint and there is a clear decoupling of emissions from growth, shown via the data below, based on figures from EUROCONTROL is a clear and factual indicator of the declining curve that our industry is following over the past 15 years.



Source : WingX based on version 2 (RDC) analysis of flight activity of target fleet 2005-2019

	Compound annual growth rate (CAGR)
Emissions per aircraft	**-0,8%** *(average rate)*
Emissions per flight per aircraft	**-1,5%** *(average rate)*
Emissions per hour per flight per aircraft	**-3,1%** *(average rate)*
Emissions per Nautical Mile per hour per flight per aircraft	**-4,6%** *(average rate)*
Emissions per ton per Nautical Mile per hour per flight per aircraft	**-6,2%** *(average rate)*

-ENDS-

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About EBAA: The European Business Aviation Association (EBAA) is the leading organisation for operators of business aircraft in Europe. Our mission is to enable responsible, sustainable growth for business aviation, enhance connectivity and create opportunities. EBAA works to improve safety standards and share knowledge, to further positive regulation and to ease all aspects of closely tailored, flexible, point to point air transportation for individuals, governments, businesses and local communities in the most time-efficient way possible. Founded in 1977 and based in Brussels, EBAA represents +700 members companies, corporate operators, commercial operators, manufacturers, airports, fixed-based operators, and more, with a total fleet of +1,000 aircraft. Follow us on Twitter, LinkedIn, Instagram and Facebook, or visit our website on www.ebaa.org.