



Mgr. Martin Kupka
Minister of Transport
Government of the Czech Republic
nábřeží Edvarda Beneše 4
118 01 Prague 1
Czech Republic

Brussels, 14 October 2022

Dear Minister,

In the name of the European Business Aviation Association (EBAA) and the General Aviation Manufacturers Association (GAMA), and our member companies, we would like to draw to the attention of the Czech Presidency of the Council of the European Union important information regarding our sector ahead of the informal meeting of transport ministers to be held on 20 and 21 October 2022.

Over the past months, a few Member States' ministers have expressed a willingness to discuss legislation to restrict Business Aviation flights, invoking sustainability reasons. We are very concerned with such an approach that would be detrimental both to our sector's decarbonization strategy and to our essential role in providing point-to-point air mobility and connectivity in the EU and globally.

Our industry has been leading aviation decarbonization with our Business Aviation Commitment on Climate Change since 2009 – 6 years prior to the Paris Agreement. This Commitment has since been updated and is now aimed at achieving net-zero CO₂ emissions by 2050, along with maintaining carbon-neutral growth from 2020 and improving fuel efficiency by 2% per year from 2020 until 2030 for future aircraft, building upon our record of 1.9% per year over the last decade. These ambitions are made possible through technological advancements, the use of Sustainable Aviation Fuels (SAF), more efficient operations and improved infrastructure, in conjunction with global market-based measures. All these efforts require massive investments, which are made possible by our members operating Business Aviation aircraft. Less income translates in lower ability to invest in decarbonization, which would push back our 2050 target. So, in consequence, restricting our ability to fly negatively impacts our ability to connect Europe, as well as to decarbonize at pace.

The variety of missions flown by Business Aviation aircraft have one common goal: providing point-to-point air mobility in the EU and globally. Our sector's point-to-point air mobility differs greatly from the commercial air transport system, articulated around hubs, or larger airports. We help governments, businesses, and individuals to fly in a flexible, safe and timely manner, and are in many cases the only available mode of transport for connecting outermost regions. Business Aviation connects over 1,400 airports in Europe, compared to only 500 served by commercial airlines. This includes medical flights, relief work, and even firefighting and border-control. EU governments, businesses and citizens not only count on our service but also often simply depend on it. Our ability to fly connect when all else fails was clearly demonstrated during the COVID-19 pandemic when both Business Aviation and Air Cargo flights kept Europe moving. In short: we fly when or where others cannot.

Burdening this essential element of the European transport system with unnecessary additional legislation would ultimately harm its users, who are eager to pay their fair share to fly in a sustainable way. Our industry was the first to showcase the use of SAF to a wider European audience in 2019 when all major aircraft manufacturers flew on SAF to Europe's primary Business Aviation tradeshow, EBACE. Business Aviation customers should be given the opportunity to contribute to the success of the EU's efforts to boost the increased production and uptake of SAF, not hindered in their efforts to fly sustainably. Much remains to be done to increase the production, distribution, and uptake of SAF at pace for all aircraft operators, which is why Business Aviation's contribution should be welcomed and leveraged. We simply request to have a level playing field and equal treatment with commercial airline operators throughout Europe, for example, under the ReFuelEU Aviation initiative or any proposed revision of the Energy Taxation Directive.

We would also like to highlight that Business Aviation and General Aviation are the lead developers of zero-emission aircraft using electric and hydrogen propulsion systems. These will be first brought to market and proven in our sector, before being scaled up to support decarbonizing commercial aviation. If Europe is to lead this wave of innovation in aviation, we encourage the European Union to prioritise more incentives rather than imposing punitive restrictions on this critical sector.

In addition to the above, Business Aviation is a direct contributor to the aviation industry's innovation ecosystem, and provides approximately 400,000 highly skilled, high-income jobs to EU citizens. As such, it is a net contributor worth billions to the EU's economy. The Business Aviation value chain also comprises a sizeable proportion of Small and Medium Enterprises (SMEs) – innovation powerhouses essential to European aviation. Preserving SMEs is of the essence as these have a powerful ripple effect on the EU's supply chain, employment, and economy.

We kindly request you take our observations into account at the upcoming informal meeting of transport ministers to be held on 20 and 21 October 2022.

Kind regards,



Juergen Wiese
Chairman of the Board of Governors
European Business Aviation Association
(EBAA)



David Van Den Langenberg
Chairman – European Leaders Steering Committee
General Aviation Manufacturers Association
(GAMA)