

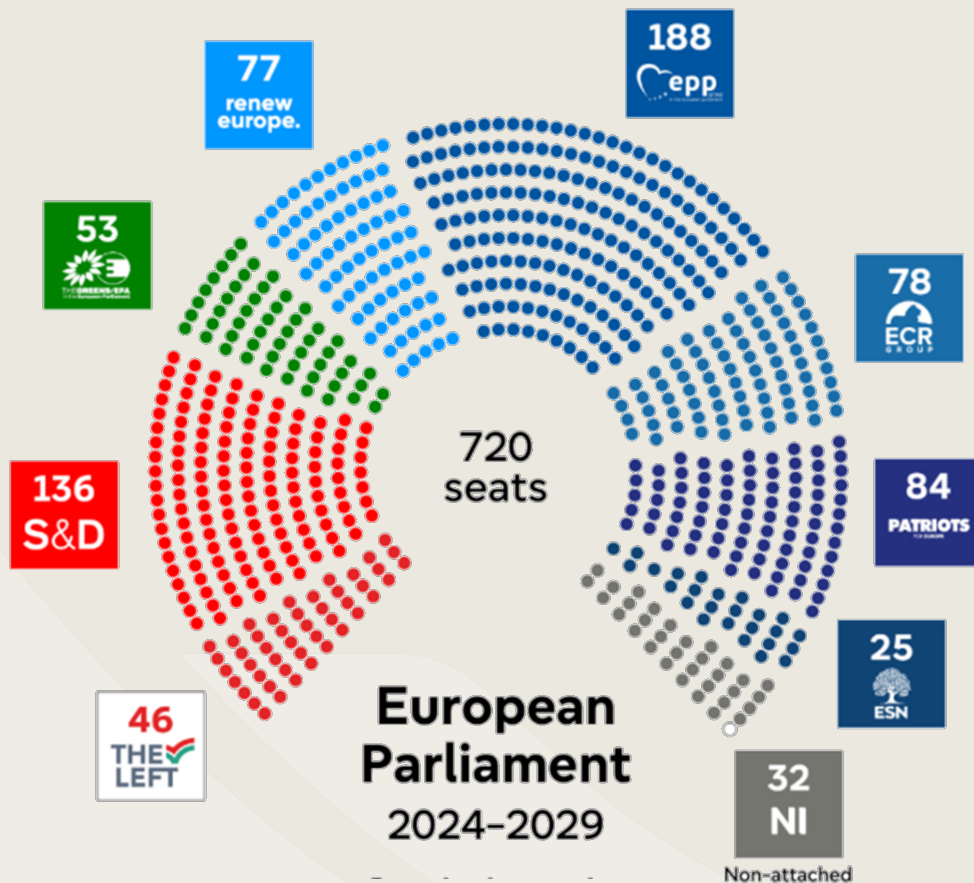
# Public Affairs, Advocacy & Communications work

**Amplifying impact: Daily advocacy and communications**  
**Updated monthly, latest update June 2025**



# A NEW EU POLICY CYCLE

After June 2024's European elections, the European Parliament has seen a marked shift to the right, while the Commission remained under the reins of von der Leyen. These new institutions are tasked with the difficult objective of balancing the Green Deal objective of the previous mandate with a renewed focus on European competitiveness.



At the start of the new EU term, we've positioned ourselves with the release of our Business Aviation booklet and a new manifesto.



## BUSINESS AVIATION BOOKLET

provides educational content aimed at EU policymakers, featuring a comprehensive overview of the business aviation sector.



## EUROPEAN BUSINESS AVIATION MANIFESTO

features EBAA-GAMA positions regarding a set of important EU policies for business aviation.



## 3 KEY MESSAGES FOR THE EU

- Safeguard a competitive and fair European Single Market for business aviation
- Enable business aviation to decarbonise
- Recognise the strategic importance of business aviation for innovation



The EU Taxonomy defines the criteria to identify environmentally sustainable economic activities, aiding companies and investors in making informed decisions about sustainable investments and green financing.



Following the ***exclusion of business aviation from the scope of the EU taxonomy***, in February 2024, **Dassault Aviation initiated an action for annulment before the European Court of Justice**, basing it on the infringement of the principle of equality.



On the 4th of July, **EBAA lodged an intervention to support Dassault Aviation's appeal**, demonstrating the association commitment to safeguarding the competitiveness and future of European business aircraft manufacturers, operators, and the entire value chain within this vital industry.







**At EBAS 2024, EBAA engaged European policymakers at the start of a new policy cycle, positioning business aviation at the center of aviation policy discussions.**

## ATTENDANCE

- 70 participants
- 2 MEPs
- 2 Commission Officials
- Operators, OEMs and regulatory experts involved



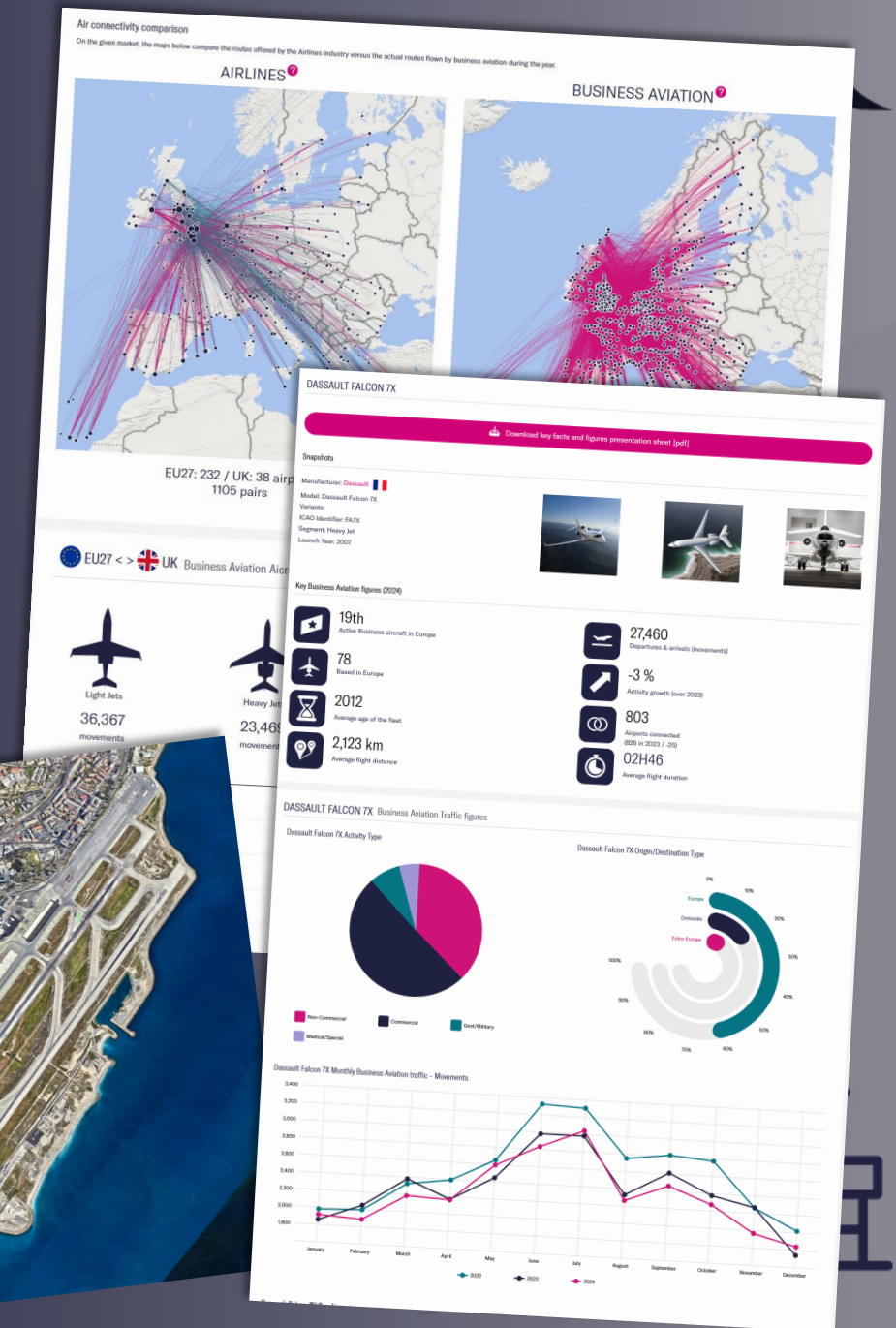
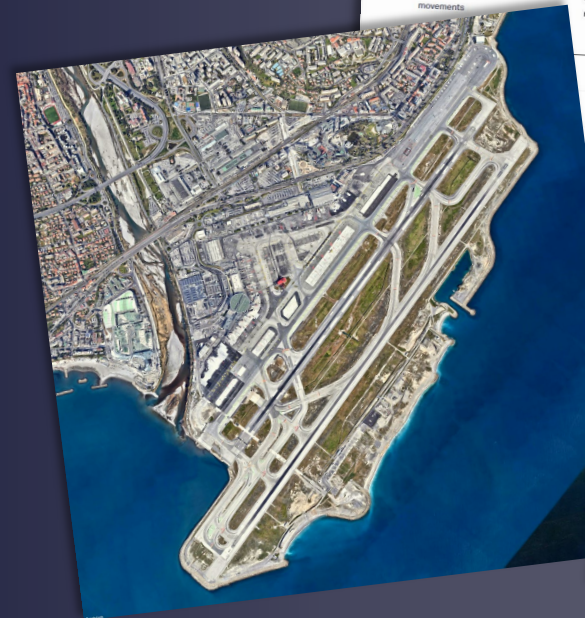
# EBAA YEARBOOK 2025

Entire and comprehensive entire 2024 data overview of Business Aviation activity in Europe :

- 40 European country individual profiles
- 40 European markets individual profiles
- Top 50 active airports individual profiles
- Top 50 aircraft models individual profiles



*Access the  
Yearbook*



# 2025 Outlook

*by Holger Krahmer, EBAA Secretary General*



# OUR CORE ADVOCACY & COMMUNICATIONS DAILY WORK







- **Boost EBAA's visibility**
- **Coalitions for greater impact**



1. **Policy breakfasts with stakeholders**
2. **Brussels events on regulations & advocacy**
3. **Engaging with Permanent Representations to the EU**



- **EU Affairs + Communications = One Clear Story**
- **Meet, Connect, Influence**

**At the start of the new EU term, we have conducted a comprehensive stakeholder mapping and reassessed our outreach strategy, reflecting the new policy environment.**

## **1. ENGAGEMENT WITH EUROPEAN PARLIAMENT**

After a productive meeting with new TRAN coordinator MEP Oetjen—who aims to be rapporteur for the New Slot Regulation—we carried out further outreach activities, including a meeting with aviation-friendly MEP Daniel Attard and Luxembourgish MEP Kartheiser, who is eager to help the sector on a broad range of topics.

## **2. OUTREACH TO PERM-REPS**

Strong focus on engaging EU PermReps from the Netherlands, Czech Republic, Luxembourg, and Spain to ensure our positions are considered when future legislative files come to a vote in the Council.

## **3. RELATIONSHIP BUILDING WITH THE COMMISSION**

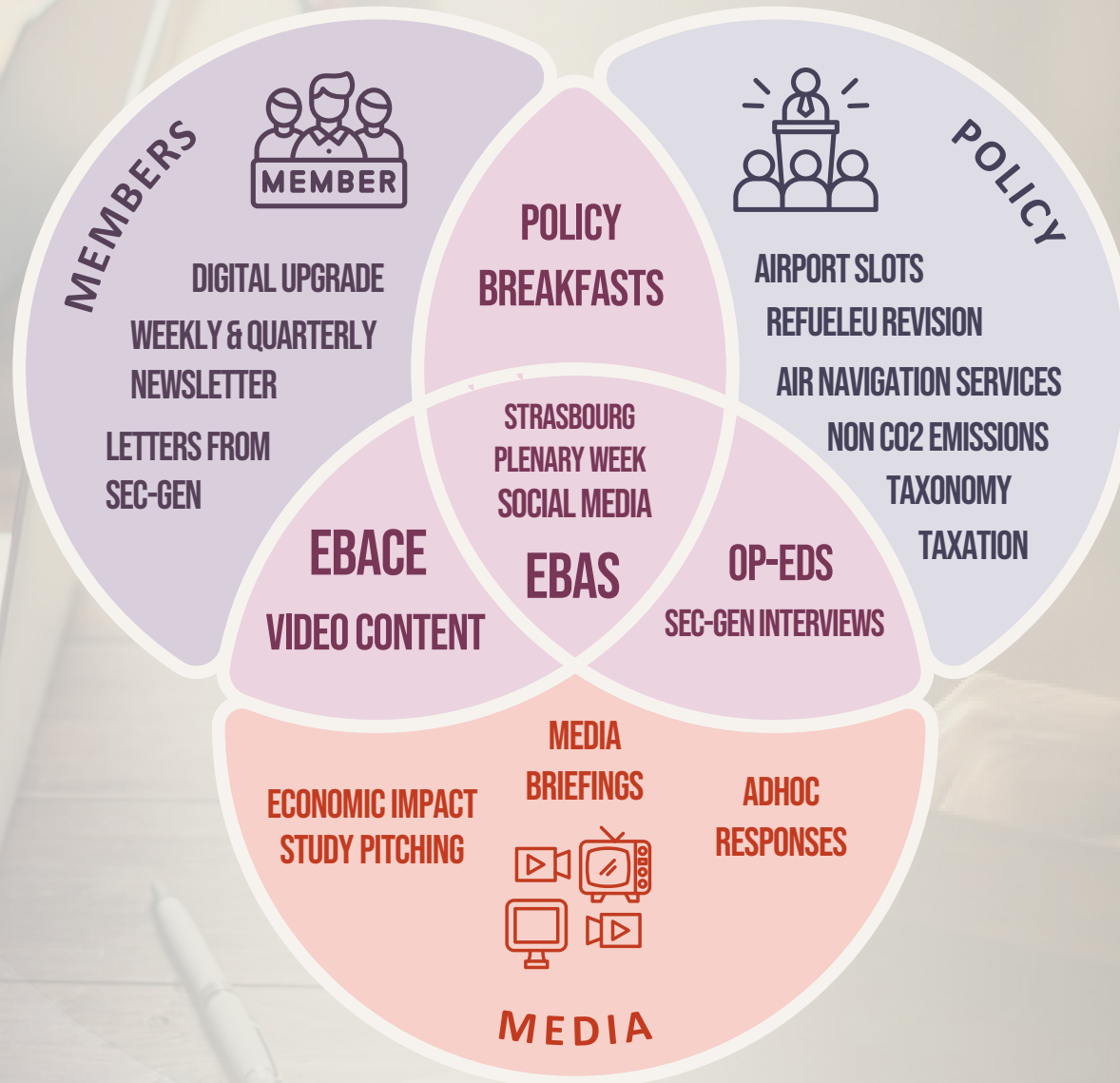
Efforts are ongoing to establish a strong footing with DG MOVE and DG CLIMA, fostering constructive dialogues for our sector's interests. A key meeting with DG MOVE's Director-General, Filip Cornelis, took place in early November 2024, followed by a second meeting with DG MOVE's Head of Unit Eddy LIEGEOIS in February 2025.



# DIFFERENT AUDIENCES AT DIFFERENT TIMES

COMMUNICATION

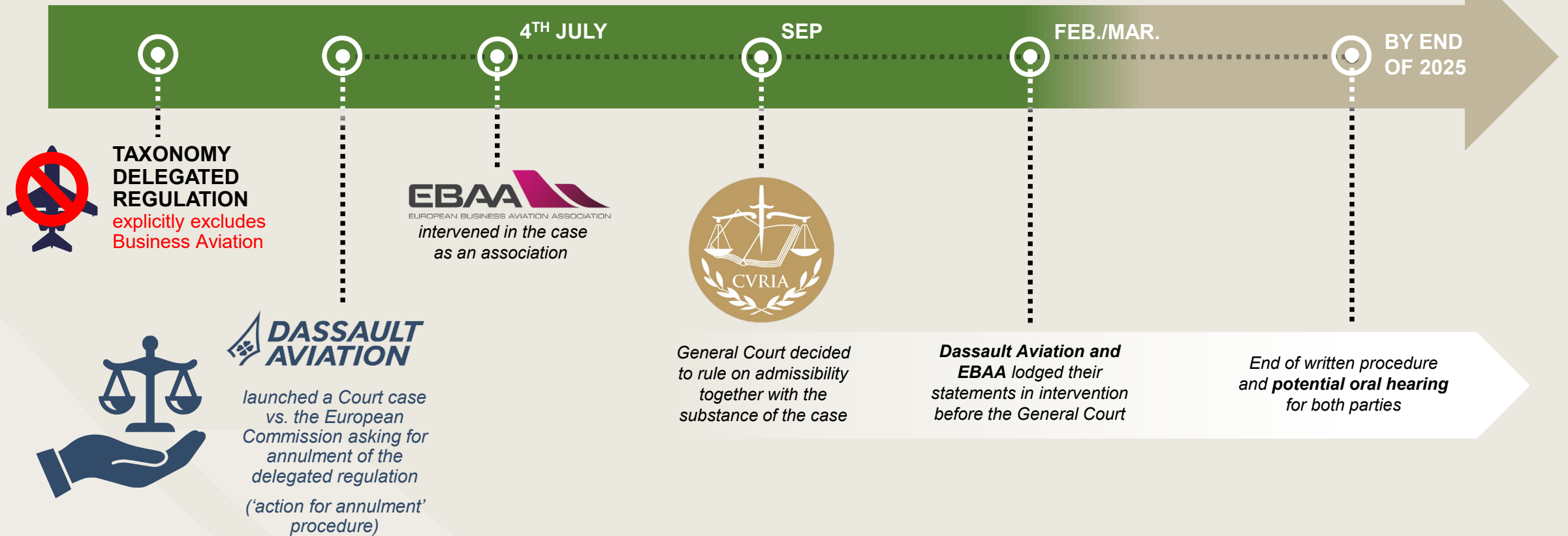
EU AFFAIRS



## DASSAULT-EBAA LEGAL COMPLAINT VS. TAXONOMY DELEGATED REGULATION CONSIDERATIONS AND CONTINUED PLAN OF ACTION

### 2024

### 2025





EBAA submitted its own intervention, focusing on rebutting the Commission's claim that business aviation cannot make a significant contribution to aviation decarbonisation.

EBAA confuted several misleading claims of the T&E report used by the Commission to justify business aviation's exclusion from the taxonomy.



## STATEMENT IN INTERVENTION

submitted, pursuant to Article 145 of the Rules of Procedure of the General Court,

by

**European Business Aviation Association asbl (" EBAA ")**, an international non-profit association incorporated under Belgian law, registered number 0425.678.758, established at Square de Meeûs 37/3, 1000 Brussels, Belgium, represented by Jacques Derenne, of the Brussels and Paris Bars, Dimitris Vallindas, of the Brussels Bar, and Ana Álvarez Vidal, *member* of the Salamanca Bar (Spain) and associate member of the Brussels Bar, *Sheppard, Mullin, Richter & Hampton LLP*, 480 Avenue Louise, 1050 Brussels,

**intervener**, in support of the applicant, ' **EBAA** ',

in Case T-77/24

**Dassault aviation**

**applicant, '  
Dassault',**

**against**

**European Commission, defendant,**

hereinafter referred to as "the Commission ".

**ReFuelEU Regulation** mandates that “*the yearly quantity of aviation fuel uplifted by an aircraft operator at a given Union airport shall be at least 90 % of the yearly aviation fuel required*” and includes reporting requirements for the fuel uplifted.

**This rule will limit operators flexibility to refuel at cheaper or more convenient locations outside the EU.**

**The antitankering rule could lead to several issues for Bizav operators:**

- Considerable administrative burden
- Increased refuelling times and operational delays
- Potential fines
- Additional safety risks



## EBAA ADVOCACY ACTIONS



Consultation to gather feedback from impacted operator members



Coordination with aviation stakeholders: A4E, ERA, ECA, IATA



Position paper in view of the regulation's review clause in 2027



Outreach to European Commission

**Members:** OPS people from leading operators, regulatory & compliance experts

## DELIVERABLES:

- 1) **Position paper:** highlight compliance difficulties and propose changes to the Regulation.
- 2) **Report of compliance difficulties:** Detailed report of instances where compliance is difficult (ex: island airports in summer).
- 3) **Compliance guide:** offer a one-stop shop for operators with all the information needed to comply with the Regulation.

## Policy asks in view of ReFuelEU review in 2027



**Exempt business aircraft with fewer than 19 seats, or provide greater flexibility in the exemption request process under Article 5(3).** This should take into account the unscheduled nature of business aviation operations by allowing airport-level exemptions rather than route-based ones and permitting operators to submit exemption requests closer to the date of the relevant flights requiring exemptions.



**Collaborate with EASA to ensure Civil Aviation Authorities (CAAs) apply tankering obligations, grant exemptions and set fines in a consistent and uniform manner** to provide predictability to operators and prevent interpretative discrepancies within the European aviation system.



**Establish a separate reporting period for the RefuelEU annual report under Article 8,** distinct from the ETS reporting deadline, to ease the administrative burden on business aviation operators.





# ENERGY TAXATION DIRECTIVE (ETD)



The Hungarian Presidency, followed by the Polish Presidency, reached a compromise at the Council level whereby **fuel used by passenger aircraft with a maximum of 19 seats will be taxed at a rate of 0.40€/litre.**

**Unanimity is required** among Members States to adopt the ETD > *One single vote against the file can block its adoption.*



## EBAA ADVOCACY ACTIONS

Letters to Member States' Ambassadors in Brussels

+

Joint letters with GAMA to Hungarian and Polish Presidencies leading the file

Met with Permanent Representations from Spain, Netherlands, Czech Republic and Luxembourg



*to be continued...*



# SAF: EU MANDATES ARE NOT MATCHED BY SUPPLY



ReFuelEU Aviation mandates fuel suppliers at Union airports to gradually increase the share of SAF blended with conventional aviation fuel **from 2% in 2024, to 70% in 2050.**

With current SAF limited availability, EBAA is advocating for including a **book-and-claim system** within the scope of ReFuelEU to allow business aviation operators to contribute to SAF uptake in the EU when it is not available on-site.



*EU Commission has been sceptical about book-and-claim, citing accounting complications and Member States resistance.*

## EBAA ADVOCACY ACTIONS



Joined aviation stakeholders consultation group providing the Commission with evidence of sustainability merits of book-and-claim.



Reached out to aviation-friendly MEPs to push the Commission to publish long-awaited feasibility study.

# BOOK-AND-CLAIM UPDATE

EBAA sent a letter together with aviation stakeholders to relevant Commissioners pushing the Commission to publish the study on the feasibility of a book-and-claim system within ReFuelEU.

In February 2025, the Commission published the study, keeping the option of including book-and-claim on the table but postponing it to the 2027 regulation review.

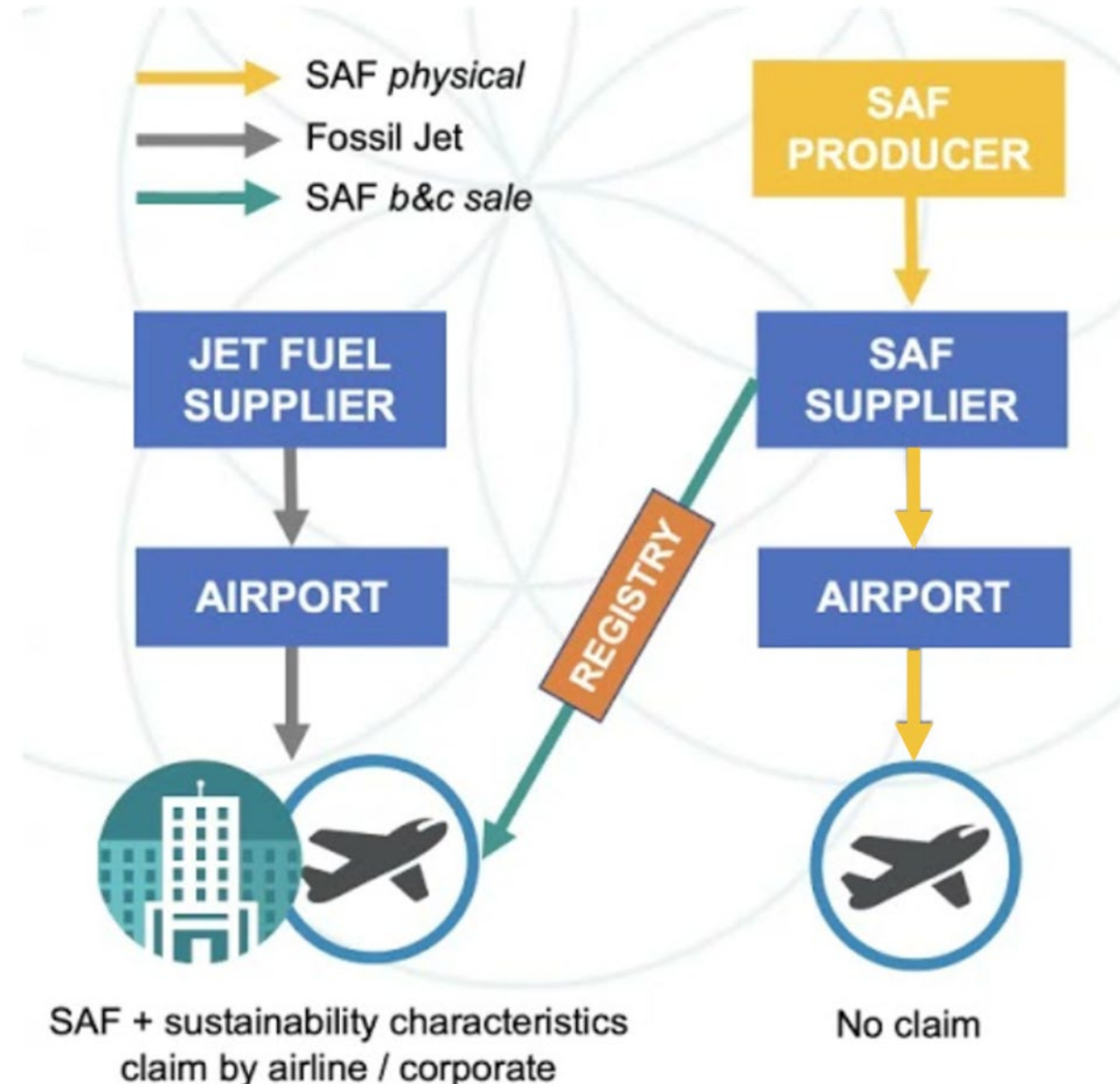


#### Joint industry letter on sustainable aviation fuels and book and claim

We, the undersigned – aerospace manufacturers, aircraft operators (passenger and cargo), airports, airport regions, express delivery companies, fuel producers and logistics service providers representing a broad spectrum of the European aviation ecosystem – are united in calling upon the European Commission to **create the necessary conditions** for our sector to rapidly decarbonise while remaining competitive by setting up an effective market for Sustainable Aviation Fuels (SAF) in line with our shared objectives. Scaling the production and supply of SAF is critically important for decarbonising air transport and achieving the EU's climate targets.

In the context of the upcoming Clean Industrial Deal and the Sustainable Transport Investment Plan (STIP), we **urge the Commission to swiftly enact further flexibilities to the ReFuelEU Aviation Regulation** in line with the findings of the Commission's stakeholder consultation which demonstrated that there is industry-wide support for the introduction of a "book and claim" mechanism to better enable market efficiencies between SAF producers, fuel suppliers and aircraft operators. This system can be introduced without any additional cost to the EU or the Member States, while it would enable better distribution of and access to SAF at competitive prices, which in turn would help to stimulate and deploy production across Europe. We also call for the Clean Industrial Deal to include **measures to incentivise access to adequate financing** of SAF production projects in the EU and ensure SAF availability and affordability.

**EBAA and its partners will continue educating policymakers on the pressing need to introduce flexibility measures to drive SAF adoption.**



# REVISION AIR SERVICES REGULATION

As part of the European Commission’s ongoing review of Regulation (EC) No 1008/2008, EBAA has submitted its official contribution, focusing on protecting business aviation’s distinct operational and economic role within the single aviation market.

## Key points from EBAA’s submission

**1. We oppose new powers for flight bans on environmental grounds**

EBAA strongly opposes the policy option to clarify or expand national powers to impose flight bans on environmental grounds. Such measures could open the door to fragmented restrictions across member states and disproportionately affect smaller aircraft and business aviation operators.

**2. We call for business aviation-specific crisis provisions**

Regulation (EU) 2020/696 did not include any provisions specifically tailored to business aviation. In future crisis scenarios, the regulation should reflect the structure and vulnerabilities of SME-based operators, particularly in relation to financial resilience and access to emergency support.

**3. We argue for fair treatment in cases of disruption and congestion**

EBAA makes the case against fragmented national handling of air traffic management disruptions such as strikes. We also highlight a competitiveness risk, as business aviation flights are often rerouted or deprioritised in favour of large carriers. The revised regulation should include safeguards to ensure fair and non-discriminatory access to European airspace.

CALL FOR EVIDENCE FOR AN IMPACT ASSESSMENT	
This document aims to inform the public and stakeholders about the Commission’s future legislative work so they can provide feedback on the Commission’s understanding of the problem and possible solutions, and give us any relevant information that they may have, including on possible impacts of the different options.	
TITLE OF THE INITIATIVE	Aviation – EU air services rules (revision)
LEAD DG (RESPONSIBLE UNIT)	DG MOVE – Unit E1: Aviation Policy
LIKELY TYPE OF INITIATIVE	Legislative
INDICATIVE TIMETABLE	Q2 2025-Q2 2026
ADDITIONAL INFORMATION	<a href="https://transport.ec.europa.eu/transport-modes/air/internal-market_en">https://transport.ec.europa.eu/transport-modes/air/internal-market_en</a>



REVISION OF SLOTS  
REGULATION (2025)



NON CO<sub>2</sub> EMISSIONS  
ADDITION TO EU ETS

ISSUE

The current slot regulation does not sufficiently meet the unique slot allocation needs of business aviation, particularly given its non-scheduled, flexible nature.

The Commission established a monitoring system (MRV) for aircraft operators to monitor non-CO<sub>2</sub> emissions, to be operational from 1 January 2025, with the possibility to add non-CO<sub>2</sub> emissions to ETS scope in 2027.

EBAA POSITION

EBAA calls for an equitable solution, recognising flexibility in the system by allowing late arrivals and equitable access to airports for business aviation operators.

EBAA calls for excluding business aviation from the scope of non-CO<sub>2</sub> emissions inclusion within ETS.





## REVISION AIR SERVICES REGULATION

### ISSUE

The Commission intends to revamp a previous proposal to revise standards to grant operating licences and regulate the distribution of air traffic.

### EBAA POSITION

**EBAA calls for ensuring that any future revision of the regulation creates a harmonised legal framework to safeguard consistency across the EU and avoid the ban on short-haul flights in certain Member States.**



## REVISION REFUEL EU

The regulation's 2026 review clause opens up possibilities to amend the antitankering mandate and include a book-and-claim system.

**EBAA calls for a tankering rule that reflects business aviation realities and a reliable book-and-claim system that includes non-Union airports in the scope.**

# EBAA MISSION TO EUROPEAN PARLIAMENT



*We will highlight the issues we bring forward, the stakeholders we engage with, and the concrete actions we take to represent business aviation at the EU level.*



## MEETING EUROPEAN LEADERS

Engage in meetings with Members of the European Parliament (MEPs) and advance key advocacy priorities for our sector.

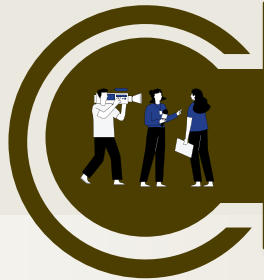
1



## SHOWING WHAT WE DO

Transparently demonstrating what we do, how we do it, and why it matters.

2



## CREATING QUALITY CONTENT

Through clear, audiovisual high-quality content, we will provide members and followers with a transparent view of our work.

3

# TIMELINE 2025: TO COME

## TAXONOMY

Input for  
Dassault  
intervention

Input for  
EBAA  
intervention



### POLICY BREAKFAST

*Oxford Economics  
Economic Impact Study*



Submitted: Call for  
Evidence Air  
Services Regulation



**EASA**  
European Aviation Safety Agency

*Report on  
implementation  
Refuel*



**POLICY BREAKFAST**  
*Non-CO2 Emissions*

JAN

FEB

MAR

APR

MAY

JUN

JUL

AUG

SEP

OCT

NOV

DEC

**EBAA Annual General  
Meeting of Members**

Meeting  
DG Move



Meetings  
Dutch  
& Spanish  
Perm. Rep.



Working Group  
Anti-Tankering



European Parliament

EUROPEAN  
BUSINESS  
AVIATION  
SUMMIT



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