

Response on draft Guidelines on State Aid to the air transport sector

Current draft guidelines for State Aid for the air transport sector extend unnecessary exemptions to support airports and do not support the transition to a more sustainable aviation sector.

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Summary

As Europe transitions to sustainable energy alternatives and away from fossil fuel dependence, the aviation sector and airports must follow. As described in our [response to the Aviation Strategy](#), airports form an important part of the aviation transition. Not only must airports themselves reduce their own emissions, they must also support and incentivize sustainable aviation across the board. Leading in the transition will allow airports and the aviation sector to remain competitive in new technology and the development of e-SAF and zero-emission Aviation. This will also increase Europe's energy sovereignty and ability to defend itself. Airports, often closely connected to their communities and government, can be a key driver for this transition.

Rather than aiming for volume-based growth and competing for routes, airports should put quality over quantity. They should halt expansion projects and focus on connectivity that adds true societal value while stimulating zero-emission technologies and investing in the aviation sector of the future. The EU State Aid guidelines should accelerate this transition and allow decisive support to those that lead. This briefing highlights the main positions of T&E regarding State Aid for regional airports and concrete proposals to improve the draft guidelines.

First, the draft guidelines extend the exemption on operating Aid to regional airports. The State Aid guidelines published in 2014 clearly specified operating Aid to regional airports was to be limited to 10 years. At the time, T&E provided [detailed input](#) on how the guidelines distorted competition and allowed harmful spending of scarce public resources. The exemption was extended by another five years due to Covid-related effects in 2023. Again, T&E concluded that such public funding did not align with the sustainability targets set by the EU for the transport and aviation sector. T&E's latest analysis shows that [European aviation emissions reached record highs in 2025](#), evidence that the sector has sufficiently recovered and operating Aid should be discontinued.

Second, when exemptions to State Aid prohibition are provided, specifically on investment support, the guidelines should ensure valuable public funding is only provided to airports that act in line with the EU's climate neutrality objective. To ensure this, strict environmental conditionalities should be attached to any Aid granted, while Aid that supports airport growth or expansion should be discontinued.

Finally, the categories of airports that can benefit under operating and investment State Aid are too broad and not in line with what is necessary to support a transition to sustainable aviation. State Aid should only be provided in cases where there is an undeniable need for connectivity that cannot be provided through any other means of transport. State Aid can also be extended to airports that can play a role in stimulating sustainable aviation alternatives such as zero-emission aviation.

Main recommendations

- 01 **Operating Aid for airports should be discontinued** to ensure no scarce public resources are supporting uncompetitive businesses that do not provide essential connectivity or support to a sustainable aviation transition.
- 02 **Investment Aid for airports should be reduced in scope and include strict environmental conditionality.** State aid for investment should go to airports that stimulate zero-emission aviation.
- 03 **The criteria for airports that are eligible for State Aid should be reduced and loopholes avoided.** Criteria should focus on airports that add significant social value in connectivity that other forms of transport cannot provide.

1. Operating Aid for airports should be discontinued

Regional airports have been subsidised for decades. Each time, the opportunity to provide State Aid was framed as a temporary measure, yet it remains in place year after year. Before the 2014 Aviation guidelines, the 2005 and the 1994 Aviation guidelines already gave Member States the possibility to provide Aid to the sector. An evaluation of the State Aid guidelines in 2020 stated that the transitional period did not seem sufficient for many regional airports to become cost-covering by 2024 or beyond. In the current draft guidelines the transitional period was extended yet again, from 2027 to 2032.

Considering the extensions upon extensions, it is highly unlikely that many regional airports will ever become profitable and in this case they would need to continue relying on public Aid. Even as the aviation sector in [Europe reaches record high emissions in 2025](#), some regional airports seem unable to stand on their own two feet and operate with a profit. As such, it is misleading to claim that the additional extension provided under the draft guidelines is exceptional and will lead to a different situation - a more positive financial outlook - in the years to come.

Instead of providing another extension of State Aid to regional airports, the Commission should acknowledge that many regional airports cannot ever become profitable and stop Aid for operating support for these airports. This is in line with EU State Aid general policy which explicitly states that non-economically viable actors should not be continuously funded. This argument is often used to justify not financing other sectors. As such, State Aid is aligned with the EU approach to competitiveness and ensuring the European economy is strong and resilient. Funding airports that will not become profitable means continuously bailing out non-viable economic actors with taxpayer money. Rather than State Aid, there are other, more effective and dedicated ways to support regional connectivity, through Public Service Obligations and regional service labels.

Proposed amendment

There is no justification for operating Aid nor for Aid that enables airport expansion. Structurally unprofitable airports should not be endlessly supported. Operating Aid in its current form should be discontinued and not be further extended, as it has proven to be ineffective. If maintained, the permitted size of airports eligible, and any transition period, should not be increased, but rather reduced, tending towards elimination. If maintained, additional criteria must be included such as a limit to Services of General Economic Interest (SGEI) airports, assessments of type of flights and their social added value and assessments of alternative, more sustainable transport modes.

Within the draft guidelines, 14.b. and 86 should be adapted to remove the exceptional extension of the transition period. Rather, State Aid should no longer be allowed to support airport operations after 3 April 2027. In case an extension is granted, T&E recommends to limit this to a maximum of three years. Within the draft guidelines, 14.b., 90 and 91 should be adapted to lower the criteria of eligible airports to max 500,000 passengers, at most.

2. Investment Aid for airports should be reduced in scope and include strict environmental conditionality

Across Europe, regional airports have facilitated an industry that has shown it is unable to curb emissions over the past decades, where other forms of mobility have been able to or are already decarbonizing. While airports are not the (only) ones at fault, their infrastructure investments must now play a clearer role to stimulate and support the transition to sustainable aviation.

Where investment Aid remains available, it should be limited to infrastructure that is directly necessary to enable ZEHA (zero emission and hybrid aviation) operations. [T&E developed a roadmap on how Europe can lead the next generation of aircraft](#), which provides clear definitions for zero-emission aviation and includes steps for airports to take. Similar guidance is provided by the EU AZEA alliance which recently published a [roadmap for Zero Emission aviation](#). Examples of sustainable investments could include grid connection and reinforcement, airside electricity distribution, charging infrastructure for electric and hybrid electric aircraft, adapted stands or dedicated operational areas and early H2 refuelling readiness, including truck based refuelling in the first phase. This way, State Aid can ensure airports stimulate the transition to the future of aviation.

Proposed amendment

The 2020 fitness check on the State Aid guidelines pinpointed the need to specifically address measures to mitigate airport's impact on the environment and climate (point 8.), and that the rules should be amended. As such, the Guidelines should explicitly require binding environmental and associated public health conditions to be attached to any aid to the sector.

The draft guidelines diminish the number of airports eligible for Aid support, from airports with 5 million passengers down to airports with 3 million passengers per year. T&E proposes a reduction of airport size for which investment Aid is allowed to maximum 500,000 passengers, in line with operating aid limits and based on the proposed [GBER version that was published for public consultation on 25 February 2026](#). However, the guidelines can include exceptions for narrowly defined cases where a genuine public interest or a concrete contribution to zero-emission aviation can be demonstrated. This should remain subject to individual notification and assessment by the Commission. Moreover, all investment Aid should include strict environmental conditionality on the use of the funds.

3. The criteria for airports that are eligible for State Aid should be reduced and loopholes avoided

Many regional airports primarily serve leisure, private and business travel markets benefiting comparatively small and often high-income user groups. In such cases, the broader societal value required to justify ongoing public support is often not evident. Pure leisure, private and charter flight services generally do not constitute a sufficient public interest to justify operating Aid.

Regional airports increasingly and disproportionately serve private jet aviation, which are 5-14 times more polluting than commercial planes per passenger and do not create any additional connectivity for communities. This is notably the case at [Antwerp airport](#), which [received over 1.5 million euros in operating Aid in 2019](#) and where the proportion of private jets compared to commercial aircraft increased from 60% to 76% between 2019 and 2022. This subsidises private tourism for wealthy individuals, and short trips that already have an alternative train or commercial flight connection. To assess what share of private jets fly from EU airports, the [T&E airport tracker provides data](#).

At the same time, post-covid traffic shows that [business aviation is not expected to return to pre-Covid levels](#) at many airports, as new ways of digital working and an emphasis on travel impact reduction has led to changes in the demand for business travel, including less domestic flights. In many countries, high levels of air connectivity have saturated this demand. And for a number of business sectors, the marginal benefit of air travel compared with digital alternatives has declined.

Some regional airports that deal with large amounts of business travel will likely never completely recover traffic levels post-Covid, as a significant share of business flying will not return. A new analysis by [T&E's Travel Smart Campaign of the business travel emissions of nine major German companies](#) reveals that, on average, they have reduced their travel emissions by 40% in 2024 as compared to 2019, with leading companies SAP and Allianz reducing their emissions by more than half.

We cannot assume based only on catchment size criteria that Aid is justified for airports. Rather, criteria should reflect real economic and societal value, and connectivity. Based on a study by the [New Economics Foundation commissioned by T&E](#), it is not correct to automatically assume net positive economic benefits. In addition, the connectivity that many regional airports claim to provide, may also be provided by other forms of sustainable mobility, be that trains or electric road vehicles. Across the EU, [domestic flying has remained beneath 2019 levels](#) as travellers increasingly turn to expanding, improved rail services. This could develop further: for example, in [Spain certain flight routes could be replaced by rail, reducing the need for regional airports](#).

Proposed amendment

The draft State Aid guidelines widens the catchment area threshold to 150km, which T&E supports. A wider catchment area avoids inefficient duplication of infrastructure and the use of public resources to support competing airports within the same market. Specifically regarding point 30, T&E supports additional criteria that take into account societal value that the airport can add, based on academically sound socio-economic research.

In addition, while the proposed extension is a step forward on the extension of the catchment area (para. 19-20) it also creates possible loopholes (para. 21) that allow any airport to receive State Aid if a neighboring airport has also received State Aid. This loophole could lead to a self-reinforcing cycle in which public subsidies undermine the viability of neighbouring airports, generating further demands for state support and perpetuating structurally loss-making business models and should be removed.

Conclusion

Europe today is at a crossroads, amidst significant global challenges including oil volatility and supply crisis. It must ensure that State Aid resources are used wisely. Therefore endless extension of general operating aid to regional airports should be stopped - especially where these airports do not bring significant economic and connectivity value in the broader public interest. Rather, State Aid investment support should have clear criteria under which crucial investments could be made on a targeted, limited basis, to support transition towards a more sustainable aviation sector.

Further information

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