

AIRE's perspective regarding EU Taxonomy

The **EU Taxonomy**, as a part of the European Green Deal, is a classification system that establishes a list of actions and activities to achieve an environmentally sustainable economy. By setting clear guidelines for what constitutes eco-friendly practices and investments, it aims to guide and promote actions that support a sustainable economy.

- The Climate Delegated Act includes the technical screening criteria for the manufacturing of aircraft, renting and leasing, passenger and freight air transport, and air transport ground handling operations. These criteria are designed to align with the EU's climate and energy goals, as outlined in the European Green Deal. Nonetheless, to meet the EU's climate and energy goals and achieve the goals of the European Green Deal, it is crucial to channel investment towards sustainable projects and activities.
- The **compatibility of the taxonomy with the development of airlines after 2030 is doubtful**. The current framework poses a significant risk to the development of emerging airlines by effectively imposing restrictions on fleet expansion. Post-2030, the acquisition of a new aircraft will be contingent upon retiring another non-compliant unit within six months¹. For airlines seeking to increase their market share and expand their fleets dynamically, this would result in a growth stagnation. Concurrently, it would confer a structural advantage to key market players who already possess hundreds of aircraft, affording them a substantial reserve for replacement.
- It is noteworthy that **commercial zero-emission aircraft** do not currently exist. Therefore, AIRE believes that **this criterion should be excluded** from the present framework, as the technology is not yet accessible.

For this reason, AIRE considers it vital to direct investment toward sustainable projects and activities. Equally important is adapting the criteria required by taxonomy rules to the current developments in aviation technology.

¹ Delegated Regulation (EU) 2023/2485 of 27 June 2023 amending Delegated Act EU 2021/2139, p.36