



## Comments on the revision of Regulation (EC) No 1008/2008

On behalf of the Confederation of Industry of the Czech Republic, we would like to submit the following comments and recommendations regarding the revision of Regulation (EC) No 1008/2008. We appreciate the opportunity to contribute to the consultation process and hope that our input will be helpful in refining the final version of the proposal.

### 1. Decarbonisation of short flights

According to Eurocontrol data, flights up to 500 km account for only 3.8% of CO<sub>2</sub> emissions from total air transport in the EU (2019). We are not sure whether it is appropriate and achievable to restrict short flights. We therefore call for a focus on support for the technological decarbonisation of aviation itself (SAF, electric and hydrogen aircraft).

### 2. Integrated assessment of the environmental impacts of transport modes

The current debate on transport sustainability often reduces environmental assessment to CO<sub>2</sub>, neglecting other key factors such as noise, resource consumption, landscape impact, and biodiversity.

Multi-criteria assessment of environmental impacts is essential for objective transport policy decision-making. Aviation has the potential for decarbonisation without the need to limit connectivity if supported by technological innovations.

Recommendation: Promote transparent information for passengers about the carbon footprint of individual connections (e.g., EASA labels), rather than imposing an obligation. Ensure that sustainability support policies do not lead to unintended consequences, such as loss of connectivity or increased noise pollution.

### 3. Maintaining connectivity as part of sustainable development

Air connectivity is crucial for the economic cohesion of regions, access to job opportunities, healthcare, and education.

Every 10% increase in direct air connectivity brings +0.5% GDP per capita (ACI EUROPE). Limiting aviation without alternatives can lead to social and economic marginalisation of some regions. Investments in sustainable aviation are compatible with the goals of the Green Deal if properly managed.

Recommendation: Do not limit the growth of aviation, but manage it sustainably through investments in technology, infrastructure, and operational efficiency. Ensure that the revision of Regulation 1008/2008 reflects the balance between environmental goals and the need for connectivity.

### 4. Role of Airports as Hubs for Sustainable Multimodal Transport

Airports are not merely the starting or ending points of air travel; they can function as integrated transport hubs connecting aviation with rail, bus, and urban transit systems.

Investments in multimodal terminals and digital journey planning systems (e.g., Mobility-as-a-Service) can significantly reduce the carbon footprint of the entire journey.

Recommendation: The regulation should recognize the role of airports in promoting multimodality and enable funding for infrastructure that connects to low-emission transport modes.

#### **5. Potential of Airports for the Production and Distribution of Sustainable Aviation Fuels (SAF)**

Airports can serve as logistics centers for the storage and distribution of SAF, and potentially as sites for local production (e.g., Power-to-Liquid technologies). Supporting SAF infrastructure at airports is essential for scaling up its use in commercial aviation.

Recommendation: The regulation should take into account the need to develop SAF infrastructure at airports and allow for its support through public funding.

#### **6. Incorporating Climate Adaptation into Airport Infrastructure**

Sustainability is not only about reducing emissions but also about resilience to the impacts of climate change (e.g., extreme weather, flooding, heatwaves). Airports must invest in climate-resilient infrastructure (e.g., drainage systems, cooling technologies, backup energy sources).

Recommendation: The regulation should acknowledge the need for climate adaptation at airports and allow such investments to be supported as part of sustainable development funding.