From: Thomas Mayer.
To: COMP STATE AID GREFFE
Subject: HT.4691_Reply_from_an_organisation
Date: lundi 30 mai 2016 19:12:08

Our number of registration within transparency register: 49070403210-05

Dear Sir or Madam,

we support your initiative on the extension of the GBER to ports and airports. Your aims to simplify the application of State aid rules, thus reducing administrative burden and costs and speeding up the implementation of projects is highly appreciated and necessary to save small airports as valuable SME. Furthermore most notices and articles are steps forward towards the recognition of the importance of airports as just more than economic entities, but also of the important role of regional and small airport structures as guarantor for a maximum mobility to connect every region within Europe with each other. Even the remotest and with airport-capacity-problems congested regions could be reached via regional airports.

With the reply of Braunschweig Airport (IATA – BWE; ICAO – EDVE) today you received under the register-number 2016/050900 a comprehensive explanation on the views of a typical regional airport affected by your proposals. We share those views by 100 % for those airport without or nearly without scheduled services open to public use.

Furthermore we refer to the replies of “European Business Aviation Association (EBAA)”. EBAA as one of the most important user-groups of the regional aerodromes underlines the comments made by Braunschweig, while they provide additional arguments in reference to industry, economics and politics, which we fully support.

In addition to these thoughts we would like to direct your view to the replies of “Union Des Aeroports Francais (UAF)”, which also reflect our view in a detailed way.

We assume there is no need to repeat all those arguments and replies, but to confirm another 120 airports in Germany, Bulgaria, France, Italia, (Switzerland) which are not covered by those of UAF, EBAA or Braunschweig are in line with them.

In summary our postulation reads:

- ERAC urge the blocks of exemption shall also include operating aids and not only investment aids because the rationale on administrative burden and simplification and about the non-competitiveness between small airports and between small and big airports are the same for operating aids as for investment aids.
- ERAC request airports whose traffic is less than 700 000 ppa (in line with state aid guideline) shall be exempted, for both operating and investment aids, because they represent a very small part of the European Pax-figures and the do not have a serious influence on competition.
- ERAC request to avoid administrative burden and to simplify the administrative rules for airports whose traffic is less than 1 million ppa (instead of 700 000 ppa previously). They shall be exempted on the obligation of notification for operating aids without any other condition.
- ERAC request for airports whose traffic is less than 1.5 million ppa (instead of 700 000 ppa previously) to be exempted on the obligation of notification for investment aids

without any other condition, excepted if the investment aim is to develop the airport for a bigger traffic.

- ERAC request to accept investment for a safe, efficient and ecologic aviation.
- ERAC urge the following airports should be regarded as not relevant to state aid. The local nature of the infrastructure and the ancillary economic activity criteria should be considered as met in case of small airports involved exclusively in:
    - ***general aviation (leisure flying)**;*
    - *and/or **business aviation**;*
    - *and/or **flight training**;*
    - *and/or **aerial work** (spreading on cropland, load transportation by helicopters…);*
    - *and/or commercial transportation on routes subject to **public service obligations (PSO)** in accordance with regulation (EC) n° 1008/2008;*
    - *and/or other **services of general economic interest** (medical evacuation, civil security…);*
    - *and commercial air transport activities limited by the following criteria: **for the carriage of own staff and non fare-paying passengers or goods as an aid to the conduct of company business** (underlined part refers to 1254/2009) and no investment project designed to increase the capacity of the airport."*

Best regards

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