



Lufthansa



Lufthansa Cargo



AEGEAN AIRLINES

Air France

Austrian Airlines

Air Dolomiti

Brussels Airlines

Croatian Airlines

KLM

Lufthansa German Airlines

Lufthansa Cargo

SAS Scandinavian Airlines

TAP Portugal

AIRLINE COORDINATION PLATFORM COMMENTS TO THE CONSULTATION ON THE WHITE PAPER ON FOREIGN SUBSIDIES

22 September 2020

Additionally to the submission to the consultation on White Paper on foreign subsidies, the Airline Coordination Platform would like to offer the following additional explanations.

General questions – Question 1

Subsidies granted by non-EU authorities to EU airlines or other relevant EU entities: In the past, such cases have included the granting of non-arms-length loans to EU airlines, artificially keeping them alive to feed into third-country airlines' hubs and networks (case for Module 1). A potential current case in the COVID-19 crisis is the provision of equity to an EU airline group by a state-subsidised third country airline, while the EU airline group is in the process of acquiring another EU carrier (case for Module 1 and 2).

Module 1 – Question 3

In the aviation industry, distortive subsidies are not limited to financial support but can also come through e.g. leasing arrangements, fuel subsidies, airport charges and many others.