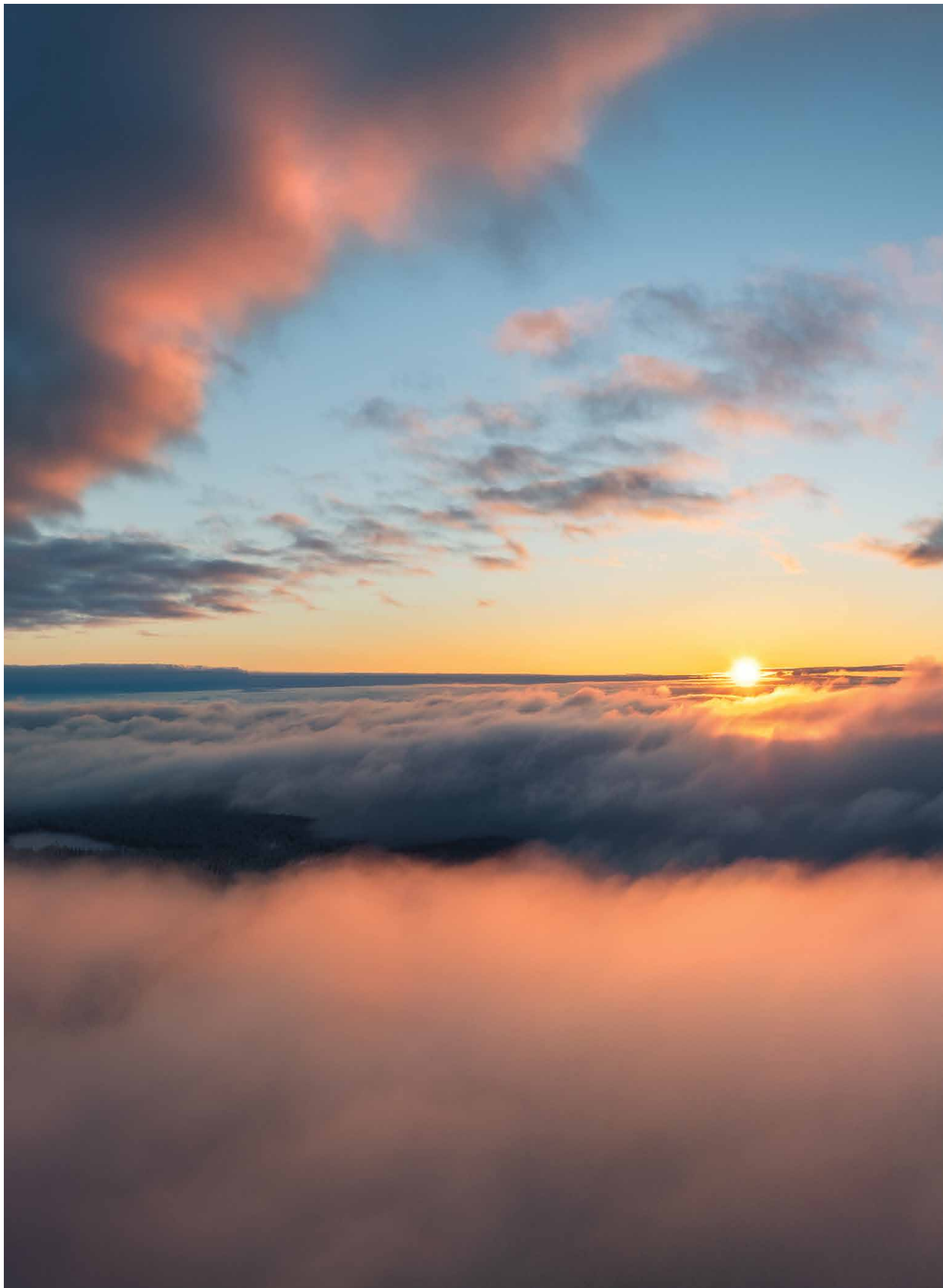




European Business Aviation Association

Public Affairs Activities in 2025







01 Foreword





“2026 will bring a workload for our community. We expect follow-on legislation and guidance across sustainability files, as well as continued pressure through taxation and airport access debates in several Member States”





Foreword

EU policymaking is entering a new phase. Priorities in Brussels are shifting towards competitiveness, industrial capacity, implementation and enforcement, alongside a focus on security and resilience. For business aviation, that can mean fewer headline moments and less sustained political attention than in recent years. It also means that when our sector does appear on the agenda, it is often viewed through the lens of scrutiny rather than operational reality.

The legacy of the '19-'24 European Commission, and the European Green Deal, remains embedded in the rulebook. The direction has been set and the pipeline of measures is moving into more demanding stages: delegated and implementing acts, technical standards, monitoring requirements, and the practical questions of compliance. Even as political emphasis evolves, regulatory momentum continues.

Against a backdrop of geopolitical change, Europe's attention is pulled in many directions. Yet 2026 will still bring a workload for our community. We expect follow-on legislation and guidance across sustainability files, as well as continued pressure through taxation and airport access debates in several Member States. The implications are tangible for operators, airports and service providers. The details will matter, and unintended consequences are likely if business aviation is not properly understood.

EBAA's role is to be present in those details, early and consistently. We advocate for proportionate, workable rules; defend the sector's ability to deliver connectivity and economic value; and engage constructively where policy can accelerate innovation and emissions reduction without distorting operations.

This report is a snapshot of EBAA's EU public affairs work delivered for members during 2025. It reflects the engagement we led with EU institutions and national authorities, the coalitions we built with partners, and the outcomes we pursued on your behalf.

Thank you for your trust, input and support.

Róman Kok
Director Public Affairs & Communications
European Business Aviation Association





02

The EU Political Climate in 2025



The EU Political Climate in 2025

The year 2025 in the European Union's political landscape was characterised by a fundamental recalibration of institutional priorities and a new era of "Security and Competitiveness." Following the 2024 elections, **Ursula von der Leyen secured a second term with 401 votes**, while the European Parliament witnessed a significant rightward shift, as the leading party EPP increasingly forged strategic, issue-based alliances with the ECR and Patriots for Europe to champion a deregulation-focused agenda, by bypassing the traditional centrist coalition (EPP, S&D, and Renew) of the previous legislative term. This political realignment was mirrored by the Commission's landmark pivot from the "Green Deal" to a "Clean Industrial Deal," strongly inspired by the 2024 Draghi Report, focused on striking a new balance between decarbonisation and competitiveness.

In this light, the Commission's 2025 work programme prioritised simplification and a series of "Omnibus" packages to cut reporting burdens across sustainability and finance files. Business groups, alongside EBAA, welcomed the direction while October saw Parliament decline to fast-track trilogues on Omnibus I, signalling political friction about how far to relax rules.

Besides the competitiveness impetus, defence was another major EU priority of 2025. Since the European election campaign in 2024, it was made clear that strengthening European Defence would be a major priority of the 2024–2029 legislative term. In March, the EU moved decisively from rhetoric to instruments with the launch of the landmark 'ReArm Europe' (Readiness 2030) plan, a massive strategy aimed at mobilising up to €800 billion in defence spending.

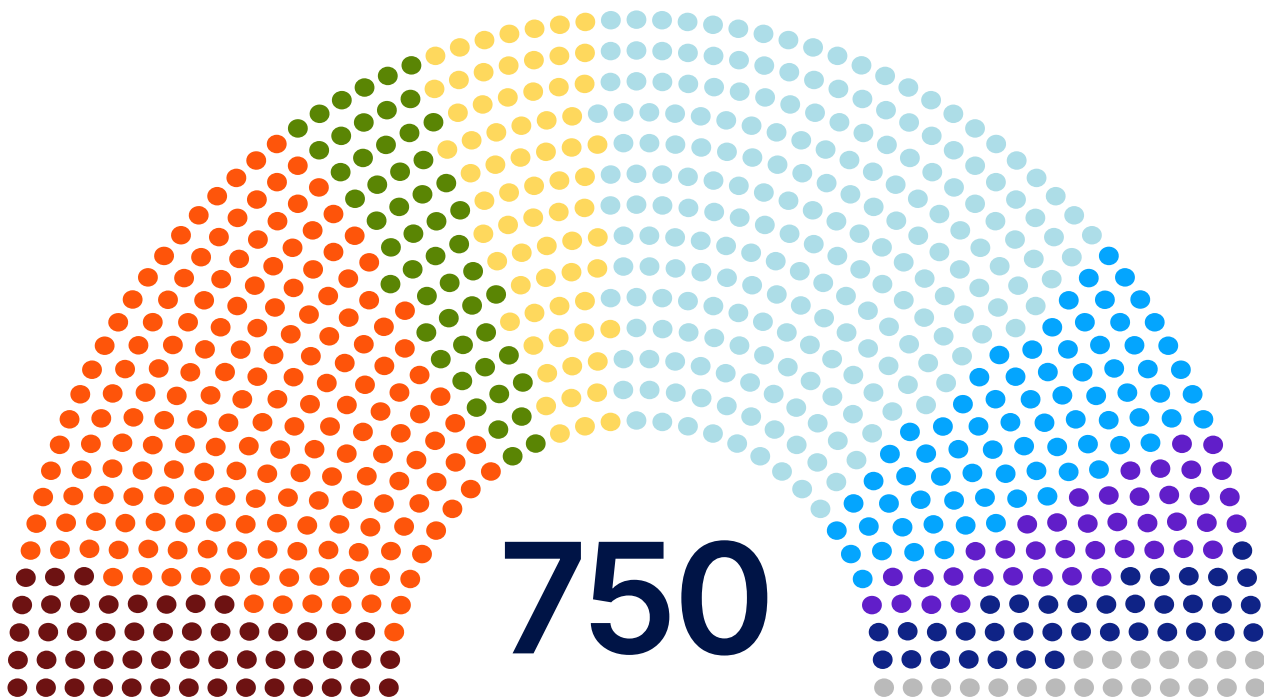
In transport, the 2035 phase-out of new ICE cars remained a controversial topic. Following months of heated debate with automotive CEOs pressing the Commission for increased flexibility, a landmark December 2025 deal replaced the 100% emissions cut with a 90% target, effectively lifting the total ban by allowing for e-fuels and hybrids.

Zooming in on aviation policy, 2025 was not a year of grand new climate laws for the sector, as most Green Deal files targeting aviation were decided last term.

Implementation was the buzzword of the year in aviation as ReFuelEU Aviation entered into force, with the first 2% SAF obligation applying to fuel supplied at EU airports.

At the same time, the gradual phase-out of free aviation allowances continued under the EU Emissions Trading System. Increased cost pressures, compliance requirements, and the ambition of the SAF targets sparked intense debate in Brussels aviation policy circles, fuelled by several affected industry stakeholders. To address some of these concerns, the **European Commission launched the Sustainable Transport Investment Plan (STIP)** in November, a non-legislative initiative aimed at mobilising public and private investment to support the deployment of sustainable transport solutions, including SAF production, infrastructure and innovation, while seeking to bridge the gap between regulatory ambition and market readiness.

European Parliament



- Left
- Socialists & Democrats
- Green
- Alliance of Liberals & Democrats for Europe
- European People's Party
- European Conservatives & Reformists
- Europe of Freedom & Direct Democracy
- Europe of Nations & Freedom
- Other (non-aligned)

Beyond laying the financial foundations for the delivery of the Green Deal objectives, the Commission also directed its aviation policy work towards addressing structural shortcomings in the existing regulatory framework by launching a fitness check of the core legislation governing European airports. **This exercise covers the Slots Regulation, the Ground Handling Directive and the Airport Charges Directive**, with the aim of assessing their suitability in today's aviation landscape. The Air Services Regulation was also put under the Commission's regulatory scrutiny with the start of a dedicated review process.

Taken together, these developments confirm that 2025 was a transitory year for EU politics. The shift

towards implementation and competitiveness created a more favourable context for business aviation to be heard, particularly in discussions on regulatory fitness and proportionality. At the same time, this transition has not removed all risks for the sector. Ongoing implementation choices, national discretion and the tendency to design rules primarily around scheduled airline operations continue to require close monitoring.

Against this backdrop, sustained engagement with decision-makers in Brussels is essential to ensure that the EU policy framework supports both Europe's decarbonisation objectives and a competitive, diverse aviation ecosystem in which business aviation can continue to operate and invest with confidence.





03

ReFuelEU Aviation

ReFuelEU Aviation

As soon as implementation issues with ReFuelEU's anti-tankering rule became evident, EBAA began work on the file to help members comply in 2025 and to build a robust evidence base ahead of the regulation's review in 2027. The review clause requires the Commission to report by January 2027 and every four years thereafter, which makes early, high-quality input essential.

We focused on three core priorities:

1. **Supporting compliance** by helping business aviation operators navigate the practical application of ReFuelEU obligations.
2. **Gathering data and evidence** to underpin EBAA's advocacy and engagement with EU institutions.
3. **Building a factual record** of the implementation challenges faced by business aviation.

This work was particularly important in light of ReFuelEU's requirement for a 90% minimum yearly fuel uplift per Union airport to curb tankering, as well as the rules governing justifications for falling below that threshold on safety grounds. Both provisions affect business aviation in a materially different way from scheduled airline operations and required targeted sector-specific analysis.

EBAA convened a dedicated ReFuelEU Working Group that met regularly throughout 2025. The Working Group was composed of operational professionals from a wide range of operators of different sizes across Europe, as well as service providers specialising in compliance support.

As a first priority, the Working Group focused on developing a **position paper** outlining the concrete compliance difficulties faced by business aviation operators under Articles 5 and 8 of the ReFuelEU Aviation Regulation. This work documented operational, administrative, and safety-related challenges observed during the initial phase of implementation and set out a series of targeted corrective measures aimed at making the regulatory framework workable for non-scheduled operators. The paper was used as a basis for EBAA's early engagement with the European Commission and EASA, ensuring that the sector's concerns were formally placed on record at an early stage of implementation.

In April, we published EBAA's "Compliance Guide: Refuelling Obligations for business aviation Operators under ReFuelEU Aviation", which walks operators through scope questions, data fields, the 90% uplift calculation, and acceptable justifications if safety fuel makes full compliance impossible on specific routes. The guide also cross-references EASA's manual and the Commission's interpretative guidelines on Article 5 exemptions.

During the summer, the Working Group compiled a **detailed and evidence-based inventory of compliance difficulties** encountered by business aviation operators, covering operational, implementation and safety-related aspects of ReFuelEU Aviation. This document was formally shared with EASA and the European Commission to ensure early awareness of the unintended consequences of the Regulation for non-scheduled operations. This was followed by a technical follow-up meeting with EASA, which allowed the Agency to deepen its understanding of the practical compliance experience of business aviation operators and the specific challenges arising from the application of Articles 5 and 8 in an unscheduled operating environment.

Building on this technical engagement, EBAA sought to ensure that the European Commission fully recognised that the compliance challenges identified were not isolated cases, but widely experienced across the business aviation sector. To that end, EBAA delivered an **open letter addressed to the Commissioner for Transport, Apostolos Tzitzikostas**, signed by 336 EBAA members representing the business aviation value chain. The letter called on the Commission to acknowledge the practical and disproportionate impacts of the Regulation on non-scheduled operators. This advocacy effort proved effective, leading to a **dedicated meeting with the European Commission and EASA** in October, where members of the EBAA ReFuelEU Working Group engaged in an open and constructive dialogue with regulators. The exchange reinforced business aviation's role as a constructive stakeholder and helped position the sector for continued engagement ahead of the Regulation's expected review in 2027.

Approaching the end of the year, on 8 December, EBAA held an **in-person meeting of the ReFuelEU Working Group** to take stock of the work carried out and to set priorities for 2026. Members agreed that the focus for the coming year should be on refining the advocacy strategy during ReFuelEU's last implementation year preceding the start of the formal review process in 2027, while also leveraging the compliance expertise developed within the Working Group for the benefit

of the wider EBAA membership. Priorities include closer cooperation with aligned aviation stakeholders in Brussels to develop joint positions towards the Commission, updating EBAA's compliance guide to reflect the latest EASA manual and guidance, and engaging with national aviation authorities to map inconsistencies in implementation, including divergent penalty regimes and differing requirements for justifying deviations from the 90 per cent uplift rule.

The Working Group also committed to supporting EBAA's advocacy on the EU ETS, particularly in light of expected Commission steps in 2026, including the report assessing the integrity of CORSIA and its alignment with the Paris Agreement, which could have implications for the future coverage of extra-EEA flights under the EU ETS.

On the same day, **business aviation compliance with ReFuelEU was discussed in a dedicated panel at the European Business Aviation Summit, (EBAS)** where active Working Group members, including Azzera, 4AIR, VistaJet and ABS Jets, engaged in a constructive dialogue with Eddy Liégeois, Head of the Aviation Policy Unit at DG MOVE, on the compliance challenges experienced throughout the year and the demands of the industry. With a view to 2026, the discussion provided a further opportunity to consolidate business aviation's credibility with the Commission as a responsible sector fully aligned with ReFuelEU's primary objective of accelerating aviation decarbonisation through increased SAF uptake, while firmly reaffirming how a tankering framework designed around scheduled airline operations places non-scheduled operators at an operational disadvantage.

2025 EBAA ReFuelEU Working Group Activities



January

Creation of the ReFuelEU Working Group



April

Release of the Compliance Guide



February

Publication of the position paper



June

Compilation of the compliance difficulties report

EUROPEAN BUSINESS AVIATION SUMMIT 25



July

Technical meeting
with EASA



October

Joint meeting with the European
Commission and EASA



June-September

Open Letter to
the Commission



December

European Business
Aviation Summit (EBAS)





04

Energy Taxation Directive





Energy Taxation Directive

The Energy Taxation Directive (Council Directive 2003/96/EC) sets the EU framework for the taxation of energy products and electricity, covering a wide range of uses including motor fuels, heating fuels and electricity. Since its adoption in 2003, the Directive has largely exempted maritime and aviation transport from energy taxation, with the notable exception of fuel used for private pleasure flights, which may be taxed by Member States. In the context of the European Green Deal, the European Commission tabled a proposal to revise the Energy Taxation Directive in 2021, with the objective of aligning energy taxation with climate and energy objectives. The proposed revision included, for the first time, the progressive removal of the tax exemption for aviation fuels.

It is important to underline that legislation in the field of taxation requires unanimous approval by Member States in the Council of the European Union, specifically in the ECOFIN Council, in accordance with the EU Treaties. As a result, Member States have remained firmly in the driving seat of the legislative process. Since 2021, several successive Council Presidencies, including Belgium, Hungary and Poland, attempted to broker a compromise, but negotiations repeatedly stalled due to opposition from a number of Member States for economic, connectivity and competitiveness reasons. One compromise text that emerged during these negotiations contained a particularly damaging provision for business aviation, proposing to **tax fuel used by aircraft with fewer than 19 seats**, for both commercial and private operations, at a rate of approximately €0.40 per litre, while also extending taxation to Sustainable Aviation Fuel (SAF). At the same time, the remainder of the commercial aviation sector would have benefited from a 10-year exemption, resulting in a clearly discriminatory outcome.

EBAA played a central role in opposing this provision, working closely with the General Aviation Manufacturers Association (GAMA), to prevent the emergence of unanimity in the Council. Together, **the associations conducted sustained advocacy towards Member States**, sending joint letters and engaging intensively with Permanent Representations in Brussels, as well as with national Ministries of Finance and Transport, leveraging the support of members and national associations.

Through our cross-European lobbying campaign, EBAA conducted sustained outreach to multiple national governments, including the Netherlands, Belgium, Spain, Hungary, Poland and the Czech Republic. Malta was a consistent and early opponent of the measure, and EBAA stayed in close coordination with it throughout the process.

In parallel, a **dedicated advocacy campaign was conducted in Ireland**, with support from the Irish Business and General Aviation Association (IBGAA) and an external consultancy, leveraging the country's strong aviation heritage to inform Ireland's position in deliberations at the Council of the European Union. Ultimately, at the ECOFIN Council meeting of 13 November, **the Danish Presidency was unable to secure unanimity on its compromise text**, notably due to opposition from Italy, Poland and Malta, which explicitly rejected the proposed aviation taxation elements.



Looking ahead to 2026, EBAA will continue to work closely with GAMA to closely monitor any further attempts by future Council Presidencies, with the support of the Commission, to revive negotiations on the Energy Taxation Directive.

This will include consolidating cooperation with Member States that have already expressed firm opposition to discriminatory aviation taxation and actively seeking to broaden this coalition in order to prevent the adoption of a final agreement that would undermine the business aviation sector.

EBAA European lobby campaign

✔ Engaged

Netherlands
Belgium
Spain
Hungary
Croatia
Czech Republic
Ireland

✔ Engaged

**(raised concerns/
opposed the measure)**

Malta
Italy
Poland







05 Consultations and Taxonomy



Structural Reforms Shaping European Aviation

In 2025, the European Commission intensified its work on reassessing and updating several core pillars of the EU aviation legislative framework that no longer reflect today's operational realities. This work has taken the form of a fitness check of the EU Airport Package, covering the Slot Regulation (EEC No 95/93), the Ground Handling Directive (Directive 96/67/EC) and the Airport Charges Directive (Directive 2009/12/EC). Additionally, the Commission also started the review of the Air Services Regulation (Regulation (EC) No 1008/2008). These instruments date back more than two decades in some cases and were shaped for a different aviation market environment. Since their adoption, the European aviation landscape has changed significantly, driven by traffic growth, airport congestion, the aftermath of COVID-19, increased coordination levels, new business models and a far more diverse mix of operators. As a result, the Commission recognised the need to assess whether these rules remain fit for purpose in ensuring fair competition, environmental sustainability and consumer protection.

EBAA prioritises engagement on these files to secure proportionate, workable rules for non-scheduled and on-demand operations and to ensure the revised framework reflects the operational realities business aviation operators face at the airports where they operate.





Air Services Regulation

Regulation (EC) No 1008/2008 (Air Services Regulation) governs air carrier licensing, market access and price transparency within the EU. In 2025, the European Commission **relaunched the consultation cycle to assess the Regulation's effectiveness and prepare a potential legislative proposal**, expected to be adopted by September 2026. During this process, EBAA actively engaged with the Commission by submitting feedback to the initial call for evidence, participating in a Commission-organised online workshop, and providing detailed input through the subsequent public consultation.

Of particular relevance to business aviation was the policy option regarding Article 20 of the Regulation, which allows Member States to restrict intra-EU air services for environmental reasons. While the Commission acknowledged the lack of clarity surrounding environmental flight bans and questioned their effectiveness in promoting sustainable connectivity, EBAA flagged significant risks for non-scheduled operators stemming from proposed measures related to environmental flight restrictions, including the potential introduction of mandatory zero-emission aircraft on short routes.

In its submission, EBAA called for the removal of Article 20, arguing that flight bans are a fundamentally flawed policy tool that undermines connectivity while delivering limited environmental benefit. Drawing on empirical evidence and operational data, EBAA highlighted the disproportionate socio-economic impacts of short-haul flight restrictions and their potential to generate counterproductive environmental outcomes, particularly at congested airports.

EBAA further stressed that such measures would be especially damaging for business aviation, which provides essential point-to-point connectivity on routes largely underserved by airlines or rail. While supporting transparency and stakeholder consultation in principle, EBAA advocated for a decarbonisation strategy based on **incentives rather than restrictions**, emphasising the role of SAF, market-driven innovation and targeted support for zero-emission aircraft development as more effective and proportionate policy solutions.

EBAA will closely monitor the Commission's work to clarify and reinforce the current legal framework and will remain actively engaged throughout the preparatory process to ensure that the final text does not introduce new or more robust legal bases that could be used to justify environmental flight bans.



Airport Package

Slots

As part of the Commission's fitness check of EU airport legislation, **EBAA actively contributed to the consultation on the EU Slot Regulation**, highlighting how the current framework, while formally neutral, systematically disadvantages non-scheduled business aviation operations at congested airports. EBAA's position was developed in close alignment with member operators particularly affected by current slot allocation practices across Europe, as well as with IBAC.

EBAA stressed that a system built around historic precedence and rigid utilisation thresholds is ill-suited to demand-driven, on-request operations, resulting in the progressive exclusion of business aviation from coordinated airports. In its submission, EBAA called for targeted amendments to ensure fair and proportionate access for non-scheduled operators, including greater flexibility in utilisation rules, harmonised and enforceable provisions for emergency and humanitarian flights, and improved transparency and accountability in slot allocation decisions.

These concerns were further discussed in a dedicated meeting with **DG MOVE**, held together with representatives from **ASL Group** and the **Dutch Business Aviation Association (DBAA)**, focusing in particular on the exclusion of business aviation from **Eindhoven Airport** as of 2026.

EBAA underlined that this decision, while taken at airport level, is a direct consequence of the way the Slot Regulation is implemented in practice and illustrates the discriminatory effects of the current framework on non-scheduled operators, with potentially far-reaching implications beyond the Netherlands.

This meeting contributed to strengthening the Commission's understanding of the structural challenges faced by business aviation operators in accessing slots at congested airports. **In 2026**, EBAA will continue to engage closely with the Commission as work on this file progresses, while also partnering with other aviation stakeholders, including **cargo operators and regional airlines**, that are similarly disadvantaged by the current slot allocation framework, in order to promote a more balanced and proportionate regulatory outcome.

Ground Handling

The fitness check also covered the **Ground Handling Directive (Directive 96/67/EC)**. In its response, prepared in coordination with **IBAC**, EBAA advocated a set of principles reflecting the operational realities of business aviation and other non-scheduled operators. These included the introduction of **proportionate access guarantees to ground handling services, the possibility to grant longer licence durations beyond the current seven-year limit where justified by significant investment commitments**, and the need to ensure transparent and inclusive capacity-allocation mechanisms **at coordinated airports**, so as to prevent the exclusion of business aviation handling activities.

EBAA further emphasised that these principles are essential to preserve competition, support investment certainty and ensure fair access to ground handling infrastructure across the EU airport network.



Taxonomy

The EU Taxonomy Regulation establishes a classification system defining which economic activities can be considered environmentally sustainable, thereby guiding private and public investment flows. In 2023, the Commission adopted a Climate Delegated Act setting out technical screening criteria for aviation, which explicitly excluded business aviation from eligibility due to its alleged environmental footprint. This exclusion carries significant implications for the sector, as it could negatively influence financial institutions' willingness to invest in activities related to business aviation.

To challenge this discriminatory approach, EBAA intervened in support of Dassault Aviation in proceedings before the General Court (Case T-77/24 Dassault Aviation v Commission), working closely with its external legal counsel throughout 2025.

During the written procedure, **EBAA submitted a formal intervention** setting out sector-wide arguments demonstrating that the exclusion of business aviation is disproportionate, technologically unjustified and inconsistent with the Taxonomy's objectives. EBAA's contribution focused on evidence of real-world emissions reduction efforts within business aviation, including increasing SAF uptake and firm orders for electric aircraft currently under certification.

In parallel to the judicial proceedings, **EBAA continued its policy engagement on the Taxonomy file.** In late 2025, the Commission's Directorate-General for

Financial Stability, Financial Services and Capital Markets Union (DG FISMA) launched a call for evidence to inform possible amendments to the Climate Delegated Act. EBAA submitted a dedicated contribution, aligning with Dassault's approach, and providing updated data highlighting business aviation's decarbonisation commitments, with the aim of ensuring consistency between the judicial challenge and the parallel policy review process.

Procedurally, the written phase of the court case closed in mid-2024. In 2025, the General Court decided to assign the case to an extended chamber of five judges, signalling the importance attached to the legal questions raised. **A public hearing took place on 10 February 2026 in Luxembourg**, at which EBAA formally supported Dassault and the wider business aviation industry as an intervener. The General Court's final judgment is expected later in 2026.

EBAA will continue engaging with DG FISMA to ensure that the review of the delegated act will reflect business aviation's demands.







06

Network and Safety Activities



Activities on the European ATM network

Common Project One ATM Functionality 6

Following the adoption of Commission Implementing Regulation (EU) 2021/116, which established Common Project One (CP1) to support the deployment of the European ATM Master Plan, EBAA began engaging on the implications of CP1 for business aviation, with particular focus on ATM Functionality 6 (AF6) and the mandated introduction of the Extended Projected Profile (EPP) as part of Air Traffic Services – B2 (ATS B2). EPP is intended as a key enabler for future Trajectory-Based Operations (TBO), with the objective of improving network predictability, trajectory exchange and flow management across the European ATM network.

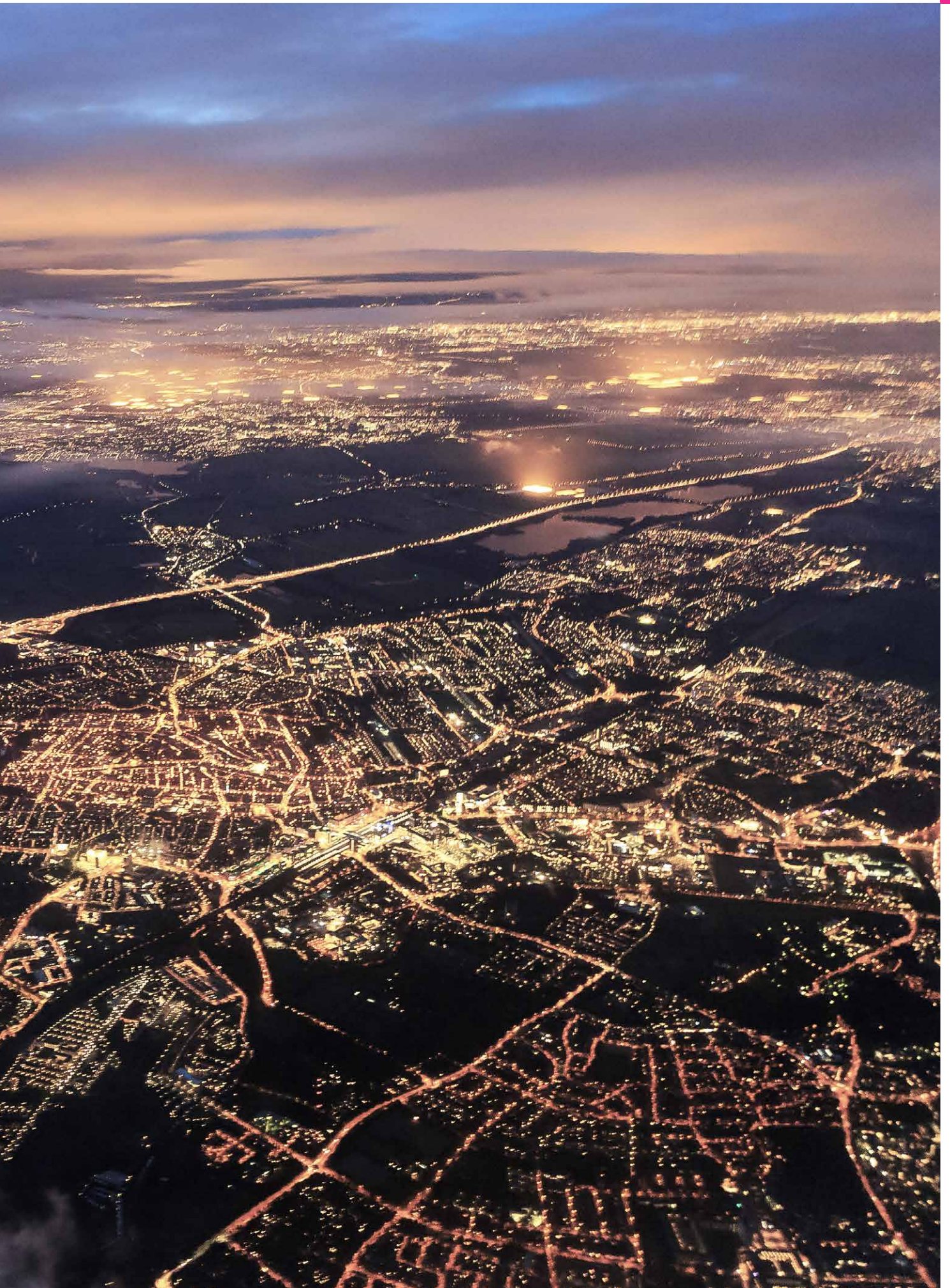
As implementation discussions progressed, EBAA identified growing concerns regarding the technical readiness, global alignment and proportionality of the proposed AF6 deployment timeline for business aviation operators. While fully supporting the long-term transition towards data-driven TBO, EBAA sought to ensure that the introduction of ATS-B2 requirements would be technically mature, interoperable at a global level and economically justified for a sector operating a highly mobile international fleet.

To this end, EBAA coordinated industry input throughout the first half of 2025 and, in July, published the “European Business Aviation Views” paper. The paper documented concrete risks associated with the current CP1 AF6 timeline, including interoperability challenges arising from multiple datalink solutions and Controller–Pilot Data Link Communications versions, fragmented deployment paths across aircraft and Air Navigation Service Providers, unresolved technical issues within

AF6, and the disproportionate impact of a European-only mandate on business aviation, which represents a limited share of European traffic but operates globally. It also highlighted the high cost of EPP-only avionics upgrades despite still-unproven operational benefits, as well as concerns over the use of non-certified performance data in an operationally binding context.

Building on this analysis, EBAA developed a set of targeted policy recommendations calling for a postponement of the AF6 EPP mandate for business aviation until ATS-B2 and TBO deployment reaches sufficient technical maturity, and for the development of a joint EASA–FAA white paper on TBO deployment to ensure global alignment on standards, assumptions and certification requirements.

This work strengthened EBAA’s engagement with EUROCONTROL and EASA on ATM modernisation, reinforcing the association’s technical and policy positioning and guiding its approach on this file into 2026.



EASA Rule Simplification Survey



In 2025, EASA has launched the Rule Simplification Survey, an essential element of EASA's Simplification Programme under the EU Better Regulation agenda. The initiative aims to streamline aviation rules, reduce complexity, eliminate inconsistencies, and ensure the regulatory framework remains both safety-centred and innovation-friendly.

Representing business aviation, we consolidated member feedback and developed a structured response focusing on three priority areas where simplification would deliver significant safety, efficiency, and competitiveness benefits.



Part-66 Licensing

Qualification of engineers

Current B2 licensing requirements no longer reflect modern avionics architecture and create disproportionate burdens for business aviation.

Three fundamental issues

- Obsolete training content and misalignment with today's aircraft technology.
- Contradictions between Part-145 competence requirements and Part-66 knowledge testing, which remains theoretical and exam-driven.
- Severe shortages of B2 certifying staff in business aviation due to the rigid type-rating model and high training costs.

We proposed

- Creating a cross-sector expert group to redesign competence profiles.
- Streamlining Part-66 content into modernised training pathways.
- Allowing the B2L licence to apply to Group 1 aircraft up to 19 passengers, combined with business aviation-tailored pathways and harmonised AMC/GM.

Expected benefits include lower training costs (–40% to –60%), improved engineer availability, shorter AOG times, and a more future-proof licensing model aligned with actual technologies.



Part-IS Information Security

Need for proportionate, non-duplicative oversight

Difficulties in complying with Part-IS and national laws.

Contradiction

- Part-IS requires proportionate, safety-driven assessment of interfaces based on the WPI061 consensus model endorsed by EASA, ASD, GAMA, and CANSO.
- National cyber authorities frequently demand full-scope supplier audits, even for interfaces with zero safety relevance – directly contradicting Part-IS proportionality.

This results in duplicated audits, excessive administrative burden, and misallocation of safety resources.

We proposed

1. Mutual recognition of equivalent compliance.
2. A lightweight compliance path for SMEs.
3. Aligned oversight between EASA and national authorities to avoid duplicated inspections.

These simplifications would preserve the intended level of safety while enabling operators to focus on safety-relevant risks.



Part-NCC

Definition of complex vs non-complex aircraft

Inconsistencies created by the outdated complex/non-complex aircraft definition in Part-NCC, which leads to divergent national interpretations and unnecessary burdens.

We recommended

- A performance-based revision of the complex/non-complex definition.
- Clear EASA guidance linking minimum crew to operational rules.
- Binding EASA Interpretation to ensure harmonisation across Member States.
- A fast-track, risk-based process for evaluating single-pilot commercial operations in borderline cases.

Simplification Priorities

- Strengthening EASA's role as the single regulator for all aviation-specific rules, to avoid fragmentation.
- Harmonising national interpretations.
- Over-complex regulation does not increase safety.

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