

ERA feedback on the draft amendments to the EU Taxonomy Climate Delegated Act



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The European Regions Airline Association (ERA) is the trade association representing more than 50 airlines and over 170 associate members, including manufacturers, airports, suppliers and aviation service providers. ERA's member airlines provide vital connectivity and support to Europe's regions, promoting social and territorial equality and cohesion as well as contributing to increased business development, tourism, investment and job creation.

We welcome the European Commission's proposed amendments to the EU Taxonomy Climate Delegated Act, which update and simplify the technical screening criteria for aviation. Specifically, the draft Commission Delegated Regulation amending Delegated Regulation (EU) 2021/2139 includes changes to the criteria for Manufacturing of Aircraft (Section 3.21) and Passenger and Freight Air Transport (Section 6.19). These amendments, published for feedback until 14 April 2026, respond to extensive industry feedback following the Commission's November 2025 Call for Evidence on Taxonomy usability. ERA supports the Commission's efforts to enhance the clarity and practicality of the Taxonomy's aviation criteria. We believe the proposed adjustments will better align the Taxonomy with technological reality and facilitate sustainable investment in regional aviation, while maintaining the Taxonomy's environmental ambition.

ERA strongly supports the extension of transitional eligibility for efficient aircraft to 31 December 2029. This two-year extension (previously set at end-2027) recognises that zero-emission aircraft will not be widely available before the 2030s. It ensures that regional airlines can continue renewing their fleets with the most fuel-efficient current-generation aircraft without jeopardising taxonomy eligibility. By avoiding a premature cut-off in 2028, the Taxonomy will continue to incentivise fleet modernisation, one of the most effective near-term levers for emissions reduction.

We welcome the explicit inclusion of hybrid aircraft as a category of sustainable aviation activity. Regional aviation is likely to lead the deployment of hybrid-electric aircraft, particularly on short routes. Recognising hybrid models within the Taxonomy sends a clear market signal that investments in these emerging technologies are considered environmentally sustainable, supporting early deployment through improved access to green financing and greater investor confidence.

ERA also welcomes the clarification of the replacement ratio methodology. Under the revised text, the share of taxonomy-aligned aircraft deliveries will be calculated and published annually by EASA, based on verified global fleet data. This centralised approach improves transparency, consistency and legal certainty, removing the need for individual airlines or lessors to calculate ratios themselves and reducing the risk of divergent interpretations. ERA supports this change as a fair and proportionate way to uphold the "no net fleet growth" principle without imposing undue administrative burdens on regional operators.

Importantly, ERA supports the revised conditions for manufacturer self-declarations in the absence of an official CO₂ emissions certificate. The previous requirement for full certification by 11 December 2026

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created an artificial deadline that risked excluding aircraft close to market entry. The amended approach allows declarations based on reasonable expectations derived from tests and procedures, provided that the certification process with EASA (or EASA validation) has been launched by 31 December 2026. This preserves environmental integrity by maintaining EASA certification as the ultimate benchmark, while offering necessary flexibility.

We further endorse the adjustment of the sustainable aviation fuel (SAF) timeline in the manufacturing criteria. Shifting the 100% SAF-capability requirement from 2028 to 2030, while maintaining eligibility through 2032, better reflects certification and infrastructure readiness, as well as the ReFuelEU Aviation ramp-up. Requiring SAF capability to be attested in the type certificate also improves clarity and verifiability, reinforcing the Taxonomy's technology-neutral approach. However, the revised timeline should also reflect uncertainty around the pace of the relevant ASTM standards process and ensure alignment with internationally recognised fuel standards, to avoid fragmentation and preserve investor certainty. More fundamentally, the framework must avoid a post-2032 cliff edge: long-term eligibility should continue to recognise best-in-class, SAF-capable aircraft where zero-emission alternatives are not yet available at scale, so that incentives for fleet renewal and emissions reductions remain effective through to 2050.

Moreover, to ensure that the proposed amendments deliver their intended impact in practice, and translate into workable outcomes for operators, lessors and financiers, ERA highlights the following implementation considerations:

- While supporting ambitious SAF deployment, limited supply, high costs and uneven availability, particularly at regional airports, could constrain compliance. The Taxonomy should remain responsive to these realities, and ERA encourages continued monitoring and, where necessary, clarification of operational criteria under Section 6.19.
- Clear guidance will be needed on aircraft withdrawal, verification and application of the replacement ratio in complex fleet and financing scenarios, to avoid unintended impacts on circular economy objectives and secondary markets.
- Alignment between Section 3.21 (Manufacturing of Aircraft) and the operational and leasing criteria under Sections 6.18 and 6.19 is important, particularly given the prevalence of leasing in regional fleet financing. Recognising lessee efforts, such as SAF use, could further strengthen incentives for sustainable investment and avoid disincentives for lessors.

ERA views 2025–2032 as a key transition period for aviation under the EU Taxonomy. We support the Commission's direction of travel and the increased clarity introduced by the proposed amendments; however, their environmental impact and usability will depend on consistent implementation and on resolving the remaining areas of uncertainty identified above. In particular, the framework should remain workable for regional operations, provide clear evidence rules (including for leasing arrangements), and avoid a post-2032 cliff-edge that could undermine investment certainty and slow near-term fleet renewal. Looking ahead to 2050, the criteria should be able to evolve in step with technology, fuel standards and infrastructure readiness, while continuing to reward real-world emissions reductions.

