Submission from:
Milieudefensie
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Ref: HT.2635

Dear Directorate-General for Competition,

In response to your consultation on the draft guidelines on State aid to airports and airlines, I would like to make the following points:

State aid to aviation should be very limited. Aviation causes much environmental and health damage. If allowed it should be only in isolated regions (e.g. remote islands North of Scotland). Certainly in a countries like the Netherlands State Aid only leads to state funded competion between airports.

Operating aid: day-to-day operating aid is a hugely distortive form of State aid and should not be allowed. Regional airports will not close down if this is enforced, they will simply grow less.

Start-up aid: no airlines should get aid for start-up routes –if airlines are not prepared to take the risk of whether a route will be profitable then it is clear that taxpayers should not either.

Infrastructure aid: Infrastructure aid should not be allowed either. If operating aid is held to be distortive and should be phased out, then there is no argument for allowing infrastructure aid either. If private investors won’t take the risk, taxpayers should not.

Aid must be transparent: All aid given must be notified to the Commission and accessible in one publicly available and clear database. After all this is taxpayer money subsidising industry.

This is a public submission and Milieudefensie is happy to have it displayed on the DG Competition website.

Best regards,
Evert Hassink
sr. policy officer
Milieudefensie