



European Commission
Directorate-General for Competition – Unit F.2
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HT. 2635: Consultation on the revision of the guidelines on State aid to airports and airlines

The Commission has published a draft of new guidelines on State aid to airports and airlines. The Confederation of Swedish Enterprise welcome the revision and wishes to state the following.

The Confederation of Swedish Enterprise, together with the Swedish Confederation of Transport Enterprises, [submitted our views](#) in the previous consultation on the 25th of September 2024. We largely maintain the same views as expressed at that time. It is important to create more long-term and appropriate conditions for the financing of airport operations. This provides greater predictability both for airport owners and for businesses that depend on good transport connections.

The Confederation of Swedish Enterprise welcomes the Commission's proposal, which overall entails that airports with up to 500,000 passengers are given clear conditions for obtaining financing in the form of operating aid through the General Block Exemption Regulation (GBER), in accordance with the draft GBER that has been presented. At the same time, the draft guidelines propose that, during a transitional period up to 2032, it should also be possible to grant operating aid to airports with between 500,000 and 1 million annual passengers.

We can note that such transitional periods have been introduced and extended on several occasions previously. In many cases, there are limited possibilities to make airport operations more efficient, at least in the Swedish context. Airports have generally incurred increasingly higher costs in the form of stricter security requirements. In addition, increased requirements for more sustainable airport operations and air transport give rise to new costs, both in the form of increased investment needs and higher operating costs. The evaluation study to which the Commission refers suggests that airports can typically achieve cost coverage in the range of 500,000–700,000 annual passengers. Based on that analysis, the threshold of 500,000 passengers is narrowly set even in a longer-term perspective.

Taken together, there is a risk that even after 2032 there will remain a need for operating aid also for airports that are slightly above 500,000 in annual passenger numbers. It would therefore have been appropriate for the Commission already now to open up the possibility that, after 2032, if such a need is identified in a future evaluation of these provisions, operating aid may also be granted to airports with between 500,000 and 700,000 annual passengers.

We also note that the Commission is expanding the threshold for what constitutes the catchment area of an airport – from 100 km and 60 minutes travel time to 150 km and 90 minutes travel time. This is based on the conclusions in the aforementioned evaluation

study, which states that airports may compete with other airports within a radius of 200 km and 120 minutes travel time. We do not question this assessment but would argue that this is not a binary issue. Rather, it may be assumed that the intensity of competition decreases with distance, such that an airport located 70 km from another airport competes significantly more intensively compared with another airport located 140 km away.

We would in particular like to point to the risk that this new threshold imposes unreasonable limitations with regard to operating and investment aid respectively. If an airport is located within the same catchment area as another airport, and that airport does not have a markedly different focus of its operations (which is rarely the case for Swedish airports), operating aid will only be able to be granted if the other airport also receives operating aid, and investment aid may only be granted if it does not create new capacity at the airport receiving the aid.

The scope of the catchment area may also affect the assessment of whether an airport can be granted aid under the framework for services of general economic interest (SGEI), where a precondition is that some part of the area potentially served by the airport, in the absence of the airport, would be isolated from the rest of the Union to an extent that would harm its social and economic development. In the assessment of whether Swedish airports can be considered to fulfil this criterion, alongside alternative modes of transport, the distance and travel time to alternative airports have been a key issue (SA.106193, SA.43964, SA.38892).

In light of this, it should be considered whether the threshold for the catchment area should remain at 100 km and 60 minutes travel time, alternatively that the threshold for the catchment area should not be made as strict, but rather become an indication to be assessed on a case-by-case basis based on the conditions prevailing in the relevant country and region.

In other respects, the Commission's proposal is supported.

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