

# Squaring the Triangle: The Economics of Pre-Filled Forms and Reduced EC261 Compensation

Dr. Hinnerk Gnutzmann

Dr. Piotr Śpiewanowski

May 2026

# About the Authors

**Dr. Hinnerk Gnutzmann** is an independent economist specializing in the quantitative analysis of European regulation. He holds a PhD in Economics from the European University Institute, an MRes from Utrecht University and an MA in economics from the University of Cambridge. His research has been published in leading academic journals and has been featured in *The New York Times*, *The Guardian* and personally referenced by President Joe Biden.

**Dr. Piotr Śpiewanowski** is an Adjunkt (Assistant Professor) at the Institute of Economics, Polish Academy of Sciences in Warsaw. He holds a Ph.D. in Economics from the European University Institute, as well as an M.Sc. in Economics from the Warsaw School of Economics. His research focuses on regulatory economics, particularly airline passenger rights, cost-pass through and commodity markets. Dr. Śpiewanowski's research has been published in leading journals, including *American Journal of Agricultural Economics*, *Journal of Applied Econometrics*, and *Transport Policy*.

This report was commissioned for the Association of Passenger Rights Advocates (APRA) by AirHelp Germany GmbH. The analysis, views, and opinions expressed in this report are those of the authors alone and do not necessarily represent the official policy or position of AirHelp or any of its affiliates.

# Executive Summary

The Cypriot Presidency non-paper (WK 6059/2026 INIT) attempts to resolve the "triangle of outstanding issues" by maintaining the three-hour threshold and introducing pre-filled forms, while cutting delay compensation. The ministerial mandate the Presidency invokes calls for rules that are "simple, enforceable, and balanced." Our micro-economic analysis shows that the proposal fails the second of these objectives: it ignores the practical conditions under which passengers can actually recover compensation when airlines reject their claims.

- **No Viability of Enforcement:** The proposal drastically reduces compensation while the legal cost for challenging claim rejection remains unchanged. Our analysis shows that it is **not economically viable** for claim agencies or individual passengers to challenge claim rejection **in 83% of cases**.
- **Rejection Becomes the Default Response:** Because the threat of enforcement disappears for most disruptions, airlines gain an incentive to **auto-reject low-value claims**. Without the "stick" of legal recourse, the successful claim rate is predicted to **drop from a 60% baseline to just 15%** — a near-75% fall, rather than the rise to 90% the Presidency projects through pre-filled forms
- **74% Fall in Compensation Paid:** While Presidency projections suggest a 27% reduction in total compensation, our model predicts a **74% fall in the value of compensation reaching passengers**. The Presidency's static model assumes pre-filled forms will yield a 90% success rate, but it fails to account for the auto-rejection incentives.
- **Eroding the Credibility of EU Passenger Rights:** Encouraging millions of passengers to file claims via pre-filled forms while making rejection the commercially rational airline response works against the proposal's stated objective. The disconnect between the ease of filing and the difficulty of recovery puts the credibility of EU passenger rights regulation in jeopardy.

# 1. The Presidency Proposal

The current Presidency non-paper (WK 6059/2026 INIT) attempts to resolve the "triangle of outstanding issues" in the EC261 revision through a proposed trade-off: **reducing passenger compensation for 3-5 hour delays by 66%** (e.g., dropping short-haul compensation from €250 down to €83) while simultaneously introducing **"pre-filled forms"** to reduce passengers' hassle cost of claiming.

The Presidency is attempting to find a stable, equitable area of agreement between the competing interests of airlines, passengers, and national regulators. However, their model assumes a **static trade-off**: that by simultaneously lowering the hassle cost of filing a claim and reducing compensation amounts, they can maintain a functional passenger rights system at lower cost.

This ignores the fundamental micro-economics of the legal process. In practice, the "triangle" of passenger rights is held together by the **viability of enforcement**. By reducing compensation from €250 to €83, the Presidency has not simply resized the triangle; they have removed its structural integrity. At €83, a claim falls below the economic break-even point for the legal intermediaries and individual litigants who currently discipline the market.

A micro-economic analysis shows that - after the credible threat of legal action is taken off the table due to reduced compensation amounts - the **successful claims rate is projected to fall by 75%**. By encouraging passengers to submit claims via pre-filled forms while simultaneously ensuring rejection is the only rational airline response, the policy **sets up millions of EU citizens for claim rejection**. This puts the credibility of European passenger rights regulation in jeopardy.

## 2. The Onerous Path to Compensation - even with Pre-Filled Forms

In practice, obtaining compensation can involve several stages. A passenger first submits a claim to the airline. If the airline rejects it — often by invoking "extraordinary circumstances" — the **passenger must decide whether to challenge the rejection**, pursue a rejected claim through an ADR body or national enforcement channel, use a claims

agency, or ultimately pursue litigation. Many passengers stop before reaching these later stages.

**Under the current EC261 framework, airlines have a strong, documented tendency to reject valid claims.** The European Court of Auditors found that approximately 60% of claims contesting airlines' "extraordinary circumstances" defence were reclassified by national enforcement bodies as not in fact extraordinary (ECA, Special Report 30/2018, para. 35), and the UK Civil Aviation Authority reports that 79% of EC261 claims reaching Alternative Dispute Resolution are upheld in favour of the passenger (CAA, CAP 1602, 2017).

This contrasts with a setting with pre-filled forms and no "extraordinary circumstances" defence such as the UK railway, where operators pay compensation regardless of the cause of delay. But even there, claim rates are below 80% in the cases with the highest compensation values, proving that low friction is not zero friction. [1]

## 3. Economics of Claim Enforcement

### 3.1 Passenger Incentive to Challenge Claim Rejection

The decision to contest a rejected claim requires evaluating expected recovery against the costs and risks of litigation. Crucially, this must account for the cost-shifting ("loser pays") principle prevalent in European jurisdictions, where the losing party bears both their own and the prevailing party's statutory legal expenses as well as court fees.

Germany provides a useful illustration because statutory litigation costs are transparent and rule-based. Under German RVG cost rules, a passenger with a €250 delay claim stands to lose €529.79 if the court case is lost.[2] A hypothetical fully rational and risk neutral passenger would decide to sue only if the probability of winning the case exceeds 67% under current rules. A "loser pays" cost-shifting principle is standard across European civil-law jurisdictions, and the comparable exposure is of similar order of magnitude. [3]

In practice, **consumers are very unlikely to try to enforce consumer rights through civil courts when there is a cost risk involved.** Meller-Hannich et al. (2023), a study commissioned by the German Ministry of Justice, documents a long-term decline in small-claims litigation in Germany, attributed to "rational disinterest" — consumers, particularly those with low incomes or limited familiarity with the legal system, are

unfamiliar with the court system, concerned with the hassle of a court case and tend to overestimate the financial risk in case of losing. The same study identifies claim agencies as the principal remedy in precisely these cases, concluding that within air passenger rights "without Legal Tech providers, no legal enforcement would take place." [4] Indeed, the experience of **EC261 before claims agencies showed very low successful claims rates.**

Claim agencies operate on a **"no win, no fee"** model, covering the passenger's risk in exchange for a success. Most cases are resolved without litigation, through structured demand letters citing applicable case law, regulatory complaints, or ADR. But where the airline contests, the agency must be willing to litigate; otherwise its threat to escalate is not credible, and airlines have no reason to settle. **Litigation cost therefore sets the relevant break-even constraint**, even though only a fraction of cases reach court.

In the current market, a claim agency may charge a success fee of 50% including VAT if a claim must be enforced through the court system. On a current €250 claim, the agency's net revenue is roughly €105. Under the Presidency proposal, the same 3–5 hour short-haul claim would generate only about €35. However, the potential loss exposure of approximately €530 remains unchanged. The agency would need to be confident of winning about 94% of such cases merely to break even. For other distance bands and delay durations, see the required win rate changes with the applicable compensation amount, as shown below.

**Table 1: Required win rate for a claims agency to break even, German RVG cost rules**

Passenger Compensation (Winning)	Legal Costs (Rejection)	Claim Agency Commission	Required Claim Agency Win Rate
Full Compensation			
€250.00	€529.79	€105.04	83.45%
€400.00	€529.79	€168.07	75.92%
€600.00	€879.68	€252.10	77.73%
Reduced 2/3 (3-5h delay under Presidency proposal)			
€83.33	€529.79	€35.01	93.80%
€133.33	€529.79	€56.02	90.44%

€200.00	€529.79	€84.03	86.31%
Reduced 1/3 (5-7h delay under Presidency proposal)			
€166.67	€529.79	€70.02	88.33%
€266.67	€529.79	€112.04	82.52%
€400.00	€879.68	€168.07	83.97%

*Legal costs according to German RVG for 2026 and calculated using <https://www.rvg-rechner.de/>; Agency commission assumed at 50% of compensation including VAT in case of going to court.*

In practice, passengers or their agents need to spend time and resources to estimate their win rate before taking the decision whether to challenge the claim. Moreover, there are fixed costs - like data collection and the operation of IT platforms for claims management. To recover these costs, the required win rate must be even higher than under these calculations.

Clearly, even with the best claims management process, it is impossible to guarantee winning every case - particularly given that airlines hold the primary evidence (such as logs and maintenance records). Because a 94% win rate is required to make challenging an €83 claim viable, claims agencies will not take them, individual passengers are unlikely to litigate them, and airlines will know that rejection carries little practical risk.

### **3.2 Airline Incentive to Reject Claims**

The reduction in compensation affects more than the passenger's decision to pursue a rejected claim. It also affects the airline's decision at the first stage of the claims process.

Airlines are rational, profit-maximizing actors equipped with sophisticated legal departments. Under the EC261 framework, airlines have the right to reject compensation claims if the delay was caused by "extraordinary circumstances." They rationally anticipate that passengers will only challenge rejection if the expected win rate is high.

Even under current rules, if passengers and their agents assess a win probability of two-thirds, it is not viable to challenge claim rejection. This creates a structural incentive for airlines to over-reject valid claims..

Under the current framework, a baseline level of compliance is maintained at the €250 compensation level. However, the Presidency proposal weakens this discipline to the point

of elimination for many claim categories. With the threat of passenger challenge removed, airlines have an incentive to **auto-reject claims with low compensation amounts**.

In section 4, we estimate the impact of auto-rejection on successful claim rates.

### 3.3 Passenger Incentive to File Claims

Pre-filled forms are designed to reduce the hassle cost of initial submission. But a passenger considering whether to file also weighs the expected outcome: whether the airline is likely to pay at the first stage, and whether a rejected claim can realistically be pursued. Sections 3.1 and 3.2 show that, under the proposal, the economic viability of pursuing rejected low-value claims is substantially weakened.

Over time, passengers will come to understand that the framework offers little realistic prospect of payout for low-value claims, and that the pre-filled form does not change that — even a low-cost effort is not worth making when the expected return approaches zero. The resulting "rational disinterest" is likely to depress initial claim volumes eventually, working against the Presidency's assumption that pre-filled forms will sustainably drive a 50% increase in claim rates.

## 4. Quantifying the likely collapse in successful claims

The Presidency's non-paper relies on a static model to project a 27% reduction in delay compensation costs. This model assumes that lower compensation reduces the value of successful claims but does not change the ability of passengers to enforce them. The micro-economics of Section 3 show that this assumption fails: under the proposal, a significant share of compensable delay claims becomes structurally unenforceable, and the realised reduction in compensation paid to passengers is several times the Presidency's projection.

### 4.1 Methodology

To assess the impact on actual compensation paid to passengers, we combine historical delay patterns from the Airhelp Core Flights dataset for 2023–2024 — covering EC261-applicable traffic — with the compensation amounts payable under the current and

proposed rules. We follow the Commission's calculation tool used in Annex 2 in two respects: we adopt its baseline successful claim rate of 60%.

We apply the required win rates from Section 3 (Table 1) using a **15% acceptable loss rate** as the viability cut-off — meaning a claims agency must, on average, win at least 85 of every 100 cases it takes on. While the exact viability threshold is unknown, the structural features of EC261 disputes make win rates substantially below 100% unavoidable. The operational facts on which an "extraordinary circumstances" defence rises or falls — including maintenance records, technical-fault logs, crew rosters and duty-hour limits, internal disruption and recovery reports, and detailed ATC communications and tower logs — are held by the airline alone, so agencies cannot verify the strength of a defence before going to court. The underlying jurisprudence is also fact-intensive: an extraordinary circumstance does not exempt the airline from compensation outright but only for that portion of the delay that the circumstance demonstrably caused.[5] To assess a case, agencies must therefore predict how a court will apportion the overall delay across multiple concurrent causes — what was extraordinary, what was reasonably avoidable, and how much of the total delay each cause contributed. Each step of this prediction is fact-intensive and contested. Cells where the required win rate (per Table 1, Section 3) exceeds the 15% threshold are treated as commercially non-viable under the current claims-agency litigation model.

## 4.2 Delays

Applying the 15% threshold to the required win rates in Section 3 identifies five cells in which claims cease to be commercially viable. To estimate the aggregate impact, we map these onto the actual distribution of compensable delays.

**Table 2: Distribution of Long Delays on EC261-covered Flights**

Flight Category	Share of Delayed Flights	Distribution within long delays		
		Delay: 3-5h (2/3 Reduction)	Delay: 5-7h (1/3 reduction)	Delay: 7h+ (Current comp)
Intra-EU, 0 - 1500 km	49%	75% (non-viable)	15% (non-viable)	10%
Intra-EU, 1500+ km	16%	71% (non-viable)	13%	16%

Extra-EU, 0 - 1500 km	20%	75% (non-viable)	15% (non-viable)	10%
Extra-EU, 1500 - 3500 km	14%	67% (non-viable)	14%	19%
Extra-EU, 3500+ km	1%	61% (non-viable)	17%	22%

Note: Based on the Core Flights dataset used in Gnutzmann and Spiewanowski (2025)

Data reveals that **3-to-5-hour delays dominate**, accounting for over two-thirds of all long-delay cases. Under the proposed compensation amounts, these claims would face auto rejection (see Section 3.2). For short-haul flights, the reduced payouts are so low that even a 7-hour delay fails to justify the cost of a challenge. Consequently, for 83% of eligible flights, enforcing the right to compensation becomes economically unviable.

**The Net Effect: A 75% Collapse in Successful Delay Claims** To understand the aggregate impact of this breakdown in enforcement, we calculate the net change in the share of eligible passengers who actually receive compensation. The Presidency's calculations assume that 60% of passengers on eligible flights receive compensation today. This figure is based on the Commission's 2020 Impact Assessment,[6] and represents the joint probability that a passenger files a claim and that the claim survives the airline's extraordinary-circumstances rejection.

The Presidency assumes pre-filled forms will lift the probability of filing by 50% without an impact on success rates, implying that 90% of all passengers on delayed flights would receive compensation. But Section 4.2 has shown that 83% of compensable delays now fall in cells where claims are economically unenforceable; only the remaining 17% can realistically support an award. Even with a 50% increase in filings, the share of eligible passengers who actually receive compensation must be scaled by this viability share.

Combining the two effects yields a new overall successful claim rate of around 15% ( $1.5 \times 0.17 \times 0.60$ ) — a 75% collapse relative to today's 60% rate.

The same result holds when expressed in compensation paid. Combining the share of compensable delays in each cell with the corresponding compensation amounts and viability under the proposal,[7] expected compensation per eligible passenger falls by approximately 74%. The Presidency's proposal implies, according to our calculations, a reduction of roughly 30% on the same per-passenger basis, consistent with the 27% figure reported in the Presidency non-paper's Annex 2.[8] The net effect under our analysis is

therefore a reduction more than twice as large as the Presidency's projection, even while accepting the Presidency's most favourable filing-rate assumption.

## 4.3 Cancellations

The reduction in passenger rights is also drastic for flight cancellations. Under current EC261 rules, passengers are fundamentally entitled to compensation if their flight is cancelled (provided the airline cannot prove extraordinary circumstances). The regulation encourages efficient recovery by allowing airlines to reduce this compensation by 50% (Article 7(2)) if they manage to re-route the passenger to their final destination with a minor arrival delay:

- Less than 2 hours for flights up to 1500 km.
- Less than 3 hours for flights 1500–3500 km.
- Less than 4 hours for flights over 3500 km.

This framework maintains passenger compensation as an absolute default, only relaxing the financial burden on the airline when excellent alternative transport is provided.

The Presidency's proposed rules dismantle this baseline. First, there would be zero right to compensation if a passenger is re-routed and arrives at their destination with a delay of less than 3 hours.

Second, the structural enforcement failure detailed in Section 4 compounds this loss. Even if a passenger arrives between 3 and 5 hours late—thereby qualifying for the Presidency's newly reduced tier of compensation—the claim is no longer economically viable to enforce. Because the payout for these mid-tier delays is reduced, the required win rate again exceeds the 85% threshold.

The combined effect is severe. Legally, the cut-off for compensation is pushed to 3 hours. Economically, the cut-off for enforceable compensation is pushed to 5 hours. Passengers subject to the immense disruption of a cancelled flight, who are ultimately delivered 4.5 hours late to their destination, will effectively possess no enforceable rights.

## 5. Beyond the triangle: a framework for effective passenger rights

Section 4's finding that the proposal reduces compensation paid by approximately 74% follows from the structural relationship between two parameters that the Presidency treats independently but that in fact interact: the nominal amount of compensation, and the enforcement architecture that determines whether a passenger can obtain payment after rejection. The Presidency proposal correctly recognises that time thresholds, compensation amounts, and the scope of pre-filled forms must be considered together. However, this "triangle" is incomplete. Effective passenger rights depend not only on the nominal amount of compensation and the ease of submitting a claim, but also on the enforcement architecture — including first-stage rejection rates, the cost of pursuing a rejected claim, the availability of binding ADR, and the allocation of the burden of proof.

The expected outcome is the product of the two: the compensation amount must be high enough, after accounting for the friction of enforcement, to make pursuing a claim rational. If either parameter is set too low relative to the other, the system fails.

Three of the four possible combinations of these parameters can deliver effective passenger rights, provided the right disciplining mechanism is in place. The fourth cannot.

**Table 3: Compensation Amount and Enforcement Friction as Joint Parameters**

	<b>Low Enforcement Friction</b>	<b>High Enforcement Friction</b>
<b>High Amount</b>	Deterrence mechanisms (e.g., Israel's Aviation Services Law)	Current EC261 Regulation (Sustains third-party intermediation)
<b>Low Amount</b>	Strict liability / No extraordinary circumstances' (e.g., UK Rail)	Presidency proposal (risk of system collapse)

- **High amount, low friction.** Both levers favour the passenger, and the system delivers compensation reliably. The question here is what disciplines airline behaviour once the threat of legal challenge is no longer the primary deterrent. A working low-friction system requires a separate penalty mechanism for non-compliance. Israel illustrates one design: the Aviation Services Law 2012 pairs ordinary statutory compensation with a punitive layer (Section 11) that imposes a

fine up to ten times the standard compensation on airlines who knowingly fail to grant the entitlement.

- **High amount, high friction.** The system can still work if the headline amount is high enough to motivate enforcement despite the friction—sustaining a credible threat that disciplines first-stage handling. Under current EC261, this is achieved through claim agencies, which pool risk across thousands of cases and finance litigation collectively in exchange for a commission. The agency model converts what would otherwise be an unviable per-case legal challenge into a commercially sustainable activity. Without that intermediary threat, individual passengers would rarely pursue €250 claims through the courts, and airline discipline would collapse.
- **Low amount, low friction.** Modest amounts are collected reliably because enforcement friction is genuinely removed: passengers do not need to pursue claims further, so the discipline question does not arise. UK Delay Repay uses compensation amounts that are a fraction of EC261's—up to the return fare—combined with pre-filled forms, automatic compensation on some operators, and crucially, **no first-stage rejection because there is essentially no 'extraordinary circumstances' defence.** (Even so, claim rates plateau at 70–80%, proving low friction is never zero friction).
- **Low amount, high friction.** The compensation is too small to justify the cost of contesting a rejected claim, so enforcement collapses. With no credible threat of legal challenge and no deterrent layer to substitute for it, first-stage rejection becomes financially unconstrained. The Presidency proposal falls squarely into this category.

The Presidency attempts to justify reducing delay compensation by up to two-thirds (e.g., reducing a €250 claim to just €83 under Article 7.3.a) by offering "pre-filled forms." However, pre-filled forms only reduce filing friction; they do nothing to reduce enforcement friction. Airlines retain the existing "extraordinary circumstances" rejection architecture.

By reducing the compensation amounts to as low as €83, the Presidency removes the economic viability of the claim agencies that currently enforce the Regulation, without substituting any other disciplining mechanism in their place. A 40% agency commission on an €83 claim cannot finance legal action, and individual passengers will not take an airline to court for €83.

The lesson across the four configurations is that for a compensation regime to function, one of two conditions must hold: either there must be a "stick" (a deterrent mechanism that makes unjustified rejection costly, via punitive damages or a credible threat of litigation), or

there must be no need for evidence (removing the 'extraordinary circumstances' defence so rejection is impossible, as in UK Rail).

The Presidency proposal does neither. It reduces compensation amounts to the point where the credible threat of enforcement collapses, while preserving the exact rejection architecture that makes a stick necessary in the first place. The 74% reduction in compensation paid documented in Section 4 is the predicted empirical signature of this configuration.

## Endnotes

[1] Department for Transport (2025). Rail delays and compensation 2025. Available [here](#).

[2] The figure of €529.79 represents the total cost-shifting exposure (own and opposing counsel plus court fees) for a losing party in a first-instance civil claim with a Streitwert of €250 under post-1 June 2025 German RVG and GKG rules, assuming the claimant separately retained counsel for pre-litigation representation. Reproducible via the Prozesskostenrechner at [smart-rechner.de](#).

[3] In Belgium, for example, the losing party pays an upfront listing fee (€30–100) and drafting fee (€35), as well as a statutory "case preparation fee" of €90–360 (basic amount €180) for claims of €250 or less, before their own legal costs (Belgian Judicial Code, Article 1022). Total exposure is therefore in the order of €155–495 for a small civil claim, in line with the German figure. Comparable data is not consistently published across the European e-Justice portal for other Member States.

[4] Pešková v Travel Service AS, Case C-315/15 (CJEU, 2017)

[5] Meller-Hannich, C., Höland, A., & Krausbeck, E. (2023), Abschlussbericht zum Forschungsvorhaben "Eingangszahlen der Zivilgerichte", Bundesministerium der Justiz, p. 306. The quoted statement summarises views expressed by interviewed legal expense insurance practitioners. English translation from the German original: "From an overarching legal-policy perspective, the interviewed experts positively recognised that in many disputes — for example in air passenger rights — without Legal Tech providers, no legal enforcement would take place."

[6] Steer (2020), Study on the current level of protection of air passenger rights in the EU, Final Report to the European Commission, Table C.8, which reports a successful claim rate of 58%. The Presidency uses 60% in its own calculations.

[7] The calculation proceeds in two steps. Step 1 — Average compensation per eligible passenger. For each scenario, multiply each cell's share of compensable delays (from the Appendix) by the applicable per-claim compensation, and sum across the nine cells. Under current EC261 rules, this yields €298. Under the Presidency's proposal applied uniformly (with reduced amounts of €83 / €133 / €200 in the 3–5h band, €167 / €267 / €400 in the 5–7h band, and current amounts at  $\geq 7$ h), the average falls to €140. Under our analysis, the same proposal amounts apply but the five non-viable cells (the 3–5h band on all three hauls and the 5–7h band on short-haul) contribute zero; only the four viable cells generate compensation, and the share-weighted average falls to €51.

Step 2 — Apply realised successful claim rates. The Commission's calculation tool used in Annex 2 uses a 60% baseline (the joint probability that a passenger files a claim and receives compensation). The Presidency projects pre-filled forms raise filings by 50%, implying a 90% rate; our analysis applies the same 90% filing rate, but only on the viable cells. Multiplying through:  $\text{€}298 \times 60\% = \text{€}179$  today;  $\text{€}140 \times 90\% = \text{€}126$  under the Presidency's projection;  $\text{€}51 \times 90\% = \text{€}46$  under our analysis.

[8] Our figure for the Presidency's projection (30%) is marginally higher than the 27% reported in Annex 2. The small gap reflects differences in the underlying data (our calculations use the Airhelp Core Flights dataset for 2023–2024) and the simplifying assumption that all flights carry the same number of passengers. Neither difference materially affects the comparison.

# Appendix: Required Win Rates by Flight Category

Flight Category	Delay: 3-5h ( $\frac{2}{3}$ Reduction)	Delay: 5-7h ( $\frac{1}{3}$ reduction)	Delay: 7h+ (Current comp)
Intra-EU, 0 - 1500 km	94% (non-viable)	88% (non-viable)	83%
Intra-EU, 1500+ km	90% (non-viable)	82%	76%
Extra-EU, 0 - 1500 km	94% (non-viable)	88% (non-viable)	83%
Extra-EU, 1500 - 3500 km	90% (non-viable)	82%	76%
Extra-EU, 3500+ km	86% (non-viable)	76%	68%