BUSINESSEUROPE

THE DIRECTOR GENERAL

Mr. Marian-Jean Marinescu

Member of the European Parliament European Parliament Bât. Altiero Spinelli, 05F163 60, rue Wiertz B-1047 Brussels

C.c.: Members and Substitutes of the Transport and Tourism Committee

6 November 2013

Re.: The Single European Sky 2+ Package

Dear Member of the European Parliament,

The efficiency of the different modes of transport in Europe, including air transport, directly affects trade flows and the competitiveness of European companies.

Effective coordination and management of European airspace is key to ensure the safe and cost-efficient flow of air traffic, thereby minimising fuel usage and costs, carbon emissions and flying times.

In this context, BUSINESSEUROPE supports the Single European Sky 2+ Package proposed by the European Commission in June. The package can further reform Europe's air traffic control system to make it more efficient and future-proof. This is not only important for airports and airlines, but also for the wider economy and European companies and citizens as users of air transport services.

In view of the upcoming discussions in your Committee on this issue, we wish to provide you with a number of comments and underline the key principles that BUSINESSEUROPE believes should be leading in this debate, which include:

- Put in place a more efficient and sustainable Air Traffic Management (ATM) System to ensure balanced growth and a steady increase of capacity.
- Enhance safety and ensure better air traffic oversight by making the National Supervisory Authorities more effective and independent.
- Gradually open up support services to air traffic control organisations to competition, while ensuring high quality and cost-effectiveness through competitive tenders.

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- Promote and maintain fair competition between airlines of different countries, not only within the EU, but also on a global level.
- Ensure better implementation of previous single sky packages.

The above elements are fundamental to improve the effective coordination and management of European airspace, ensure fair competition and improve air transport services in Europe.

You will find more detailed remarks at annex. We trust that you will take our views into account in the process towards adoption of the European Parliament's Reports.

Yours sincerely,

BUSINESSEUROPE

Markus J. Beyrer



ANNEX – COMMENTS ON THE SINGLE EUROPEAN SKY 2+ PACKAGE

- The implementation of previous single sky packages falls well below expectations and European airspace remains fragmented in practice.
- At a time when European airlines are already facing tough global competition, these inefficiencies bring extra costs of close to €5 billion a year. It adds 42 km to the distance of an average flight forcing aircrafts to burn more fuel, generate more emissions, pay more in costly user charges and suffer greater delays. For comparison, the United States controls the same amount of airspace, with more traffic, at almost half the cost.
- According to the latest Commission estimates, there will be 14.4 million flights by 2035 in Europe, 50% more than in 2012. Hence, the pressing need for more efficient coordination and management of European airspace to avoid a capacity crunch, which would hamper economic growth.
- Audits of the European Aviation Safety Agency (EASA) have shown the need for better oversight of the air traffic control organisations - or so-called Air Navigation Service Providers (ANSPs) - in the Member States. Therefore, we support the measure to ensure organisational and budgetary separation of the National Supervisory Authorities from the ANSPs that they oversee, while making sufficient resources available to carry out their supervisory tasks properly. Many supervisory authorities are currently under-resourced and dependent on the support of the entities that they are supposed to oversee, which is not a healthy situation.
- Support services to air traffic control organisations, such as meteorology, aeronautical information, communications, navigation or surveillance services should be gradually opened to competition. Such support services should be separated from the core tasks of the air traffic control organisations and put out to tender under normal procurement rules to ensure both high quality and costeffectiveness. This could lead to 20% savings on such services.
- It is important to meet customer needs. Therefore, it is positive that the Commission proposes that in the future airlines will have a bigger consultative role in signing off on the investment plans of air traffic control organisations.
- A more transparent and independent performance scheme focused on safety, costefficiency, capacity and environment is essential to set ambitious targets, benchmark progress and better measure air traffic management performance. The Performance Review Body has a key role to play in this respect.
- To avoid a duplication of tasks, it is positive that this package clarifies the different roles and responsibilities (between oversight, drafting of technical rules and regulatory issues) of the EASA, Eurocontrol and the European Commission.
- Swift implementation of the Single European Sky 2+ Package and previous single sky packages is fundamental to strengthen European coordination of airspace



management in order to maximise the airspace available whilst optimising its use and safety, also to the benefit of the environment.

- The ultimate goal is to promote worldwide freedom of air services and investment. Progress towards this objective can be achieved either through bilateral or multilateral negotiations, which favour market needs. Progress towards this objective can only be achieved if EU Member States show serious political commitment.
- It is imperative that the European policy-makers provide a regulatory Air Traffic Management (ATM) framework that is able to link to other international systems notably the US NextGen system - to promote and maintain fair competition between airlines of different countries, not only within the EU, but also on a global scope.
- Ensuring better connectivity between airports, the hinterland and other transport networks is key.

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