

Aviation package for improving the competitiveness of the EU Aviation sector

Fields marked with * are mandatory.

Please provide information to help us build your profile as a respondent. In accordance with [Regulation 45/2001](#), all personal data collected through this survey will be kept securely and will ultimately be destroyed.

*Please note that the questionnaire will only use your full contribution if your name, organisation (if you answer on behalf of an organisation or institution) and contact details are provided. If you choose to not provide your name, organisation and contact details, you have the option of submitting a general comment only.

If you do choose to provide us with your name, organisation and contact details, you can still opt for your answers to remain anonymous when results are published.

- Yes, I will provide my name and contact details
- No, I prefer to provide a general comment only

A. Respondent details

*1a. I speak

- In my own capacity
- On behalf of an organisation directly representing stakeholders
- On behalf of an umbrella association representing stakeholders' organisations

*3. First name

Abdul Wahab

*4. Last name

Teffaha

*5. Address

85 ANis Nsouli Str, Zakaria Nsouli bldg., Verdun

*6. City

Beirut

*7. Email address

iad@aaco.org

*8. Please indicate your country of origin

Not relevant being an umbrella organisation

*9a. I answer the questionnaire as a ...

- Private person
 Professional

*9b. Which of the following categories best describes your activity or that of your members?

- | | |
|---|--|
| <input type="radio"/> Public authority (Member State Representative, Ministry, Agency, other) | <input type="radio"/> Airport |
| <input type="radio"/> Regional airport | <input type="radio"/> Air Navigation Service Provider (ANSP) |
| <input type="radio"/> Groundhandling company | <input type="radio"/> Maintenance company |
| <input type="radio"/> Other airport service provider | <input type="radio"/> Aircraft manufacturer |
| <input type="radio"/> Supplier of aircraft manufacturer | <input type="radio"/> Aircraft financier, leasing company |
| <input type="radio"/> Airline and aircraft operator | <input type="radio"/> General aviation industry |
| <input type="radio"/> Retailer at airport | <input type="radio"/> Pilot |
| <input type="radio"/> Other crew member | <input type="radio"/> Workers' organisation (union) |
| <input type="radio"/> Trade association | <input type="radio"/> Research/Academia |
| <input type="radio"/> Consultancy | <input type="radio"/> Logistic company, logistic integrator |
| <input type="radio"/> Organisation representing consumers | <input type="radio"/> Organisation representing environmental / climate stakeholders |
| <input checked="" type="radio"/> Other (please specify) | |

*Please specify "Other"

Arab Air Carriers Organization (AACO): An association gathering airlines based in states of the Arab League

*10. What is the size of your organisation?

- Micro company (less than 10 employees, up to €2 million turnover, or balance sheet up to €2 million)
- Small company (less than 50 employees, up to €10 million turnover, or balance sheet up to €10 million)
- Medium size company (up to 249 employees, up to €50 million turnover, or balance sheet total up to €43 million)
- Large corporation (250 employees or more, more than €50 million turnover, and balance sheet total of more than €43 million)
- Organisation representing group of stakeholders
- Local/Regional Authority
- National Authority
- European Authority
- I don't know / Not sure
- Other, Please specify

*11. Contributions received from this survey may be published on the European Commission's website, with the identity of the contributor. Do you agree to your contribution being published under your name?

- My contribution may be published under the name indicated
- My contribution may be published but should be kept anonymous
- I do not wish any of my contributions to be published

*12. May the Commission contact you, in case further details on the submitted information in this questionnaire are required?

- Yes
- No

C. Questions to public authorities, industry and other professional stakeholders

1. Which of the following areas do you consider important to improve the competitiveness of the EU aviation industry?

	Not at all important	Somewhat important	Neutral	Important	Very important	No opinion / not relevant
*Regulatory harmonisation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Market access	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Access to financing	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Airport capacity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Infrastructure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Taxation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Innovation (digitalisation)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Innovation (manufacturing)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Safety	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Security	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

*Air traffic management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

2a. Do you agree with the following statements as regards comparison of EU and non-EU carriers?

	Strongly disagree	Somewhat disagree	Neutral	Somewhat agree	Strongly agree	No opinion / not sure
*EU carriers do not face challenges when competing with non-EU carriers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Non-EU carriers have cost advantage vs. EU carriers (including lower labour cost)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Non-EU carriers receive uncontrolled state subsidies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Non-EU carriers enjoy a more favourable tax regime than EU carriers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*There is a discrimination by non-EU States or non-EU service providers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Non-EU carriers offer more attractive products and services than EU carriers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

*There is overcapacity on the route served	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Non-EU carriers have a larger global network than EU carriers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Unfair commercial practices are used by non-EU carriers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Non-EU carriers have a geographic advantage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Non-EU carriers are managed more efficiently than EU carriers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please specify "Other"

EU carriers have relatively older aircraft than carriers in the Gulf and in the Asia Pacific regions. This negatively impacts EU carriers' environmental footprint and increases the cost base of these carriers.

***2b. Which do you consider are the most important three challenges or obstacles facing EU carriers when competing with non-EU carriers?**

between 3 and 3 choices

- EU carriers do not face challenges when competing with non-EU carriers
- Non-EU carriers have cost advantage vs. EU carriers (including lower labour cost)
- Non-EU carriers receive uncontrolled state subsidies
- Non-EU carriers enjoy a more favourable tax regimes than EU carriers
- There is a discrimination by non-EU States or non-EU service providers
- Non-EU carriers offer more attractive products and services than EU carriers
- There is overcapacity on the route served
- Non-EU carriers have a larger global network than EU carriers
- Unfair commercial practices are used by non-EU carriers
- Non-EU carriers have a geographic advantage
- Non-EU carriers are managed more efficiently then EU carriers
- Other (please specify)

Please specify "Other"

EU carriers face a variety of very costly regulations and have to abide by a ban on night flights. In some other regions, regulations take into account the sustainability of the air transport sector along with consumer benefits, and also their carriers enjoy a 24 hours operations from their hubs.

2c. Can you identify unnecessary regulatory cost and procedures arising from EU legislation posing a burden and thus negatively affecting competitiveness?

EU 261/2004 is by far the regulation with the highest burden on the airlines in the EU. This regulation is estimated to cost airlines around 5.2 billion Euros annually. The various interpretations of the regulation by the ECJ have also added to confusion and burdens resulting from this regulation to both airlines and passengers. The file of the revision of this regulation should be treated with high priority and should bring proportionality between passenger rights and airlines' competitiveness. The other issue of this regulation is that it puts airlines in a competitive disadvantage vis-a-vis other modes of transport which do not fall under any regulation similar to the EU 261/2004.

3a. In which areas should more be done to bolster international competitiveness of the EU aviation sector?

	Not at all important	Somewhat important	Neutral	Important	Very important	No opinion / not relevant
*Market access in non-EU markets	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Regulatory harmonisation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Effective dispute resolution	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Fair competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Safety and security standards	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Social standards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Environment standards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Consumer protection rules	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Taxation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Airline ownership and control rules	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please specify "Other"

Infrastructure developments and ATM enhancements

*3b. Which are the three most important areas to focus on?

between 3 and 3 choices

- Market access in non-EU markets
- Regulatory harmonisation
- Effective dispute resolution
- Fair competition
- Safety and security standards
- Social standards
- Environment standards
- Consumer protection rules
- Taxation
- Change of airline ownership and control rules
- Other (please specify)

Please specify "Other"

Infrastructure developments and ATM enhancements

4. Which instruments should the EU use in order to bolster the competitiveness of the EU aviation sector internationally?

	Not at all important	Somewhat important	Neutral	Important	Very important	No opinion / not relevant
*Development and implementation of EU template clauses for air transport agreements (for instance a template fair competition clause)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*EU level comprehensive air transport agreements to ensure market access in key aviation markets and promote an effective regulatory framework	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>*An effective defence mechanism to address unfair commercial practices in international air transport</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<p>*Multilateral efforts in the framework of the International Civil Aviation Organisation (ICAO)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>*Cooperation on research and innovation</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
<p>Other (please specify)</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

5. The EU has signed comprehensive aviation agreements with EU neighbourhood countries (Western Balkans, Morocco, Georgia, Jordan, Moldova and Israel) and with major aviation partners (US and Canada). Negotiations have been finalised with Ukraine and are on-going with Brazil. The Council has also granted authorisations to negotiate with Australia, New Zealand, Azerbaijan, Lebanon and Tunisia.

Which countries/regions should in your view be priorities for possible future EU-level negotiations of comprehensive air transport agreements? Please list countries/regions in order of importance.

We believe that future EU-level negotiations of comprehensive agreements should be with countries that share mutual benefits with the EU. Benefits in terms of benefits to the economic development of both countries while enhancing trade and tourism. The decision to enter negotiations for comprehensive agreements should not be affected by protectionist moves to protect EU airlines from the competitiveness of non-EU airlines, nor by the competitiveness of the third country's airports and services thereof.

6. Are there any specific issues in relation to international air transport agreements that you wish to raise?

International air transport agreements

- Should be negotiated based on reciprocity and bringing benefits to both parties.
- Such agreements should not be driven for the benefit of one side of the agreement
- Should avoid the imposition of regulations of one party on the other
- Should avoid extraterritorial application in regulations.

*7a. Should the EU intensify its efforts at multilateral level towards free access to markets and further liberalisation of air transport through multilateral agreements?

- Strongly disagree
- Somewhat disagree
- Neutral
- Somewhat agree
- Strongly agree
- No opinion / Not sure

7b. Why?

Be it multilateral or bilateral, free market access has proven to enhance economic activity and development between the concerned states, has resulted in cheaper ticket prices, more connections for people and goods and many other benefits

7c. How?

global efforts under ICAO umbrella

*8a. The EU rules on ownership and control currently allows foreign investment up to 49% of an EU air carrier while effective control must remain in EU hands.

Do you consider that current EU rules on ownership and control of EU airlines should be ...

- ... relaxed (on unilateral basis)
- ... relaxed (on the basis of reciprocity)
- ... tightened
- ... maintained?
- No opinion / Not sure

8b. Why?

Relaxing the ownership and control of EU airlines could help EU airlines become more competitive and enhance connections and result in cheaper ticket prices to the consumer. Foreign investments in airlines in the EU have helped these airlines improve their financial situation.

*9a. There is an emergence of new forms of airline ticket distribution over the internet. The Code of Conduct on computerised reservation systems - CRS (Regulation (EC) No. 80/2009) provides for a number of rules intended, in particular, to avoid bias in case a CRS is owned or controlled by an airline.

Do you consider that the terms of CRS Regulation 80/2009 are still appropriate having regard to the above mentioned new forms of distribution?

- Yes
- No
- No opinion / Not sure

9b. If no, what should be changed?

We would like to refer to the EC letter of 30 June 2014 (MOVE E.4 - AB/gb - move.e.4(2014)2329346) that sought stakeholders opinion on productivity-based agreements between CRSs and travel agents that might incentivize some travel agents to create fake bookings through the CRS platforms. We urge the Commission to follow up on this trend and to amend the CRS code of conduct if need be to limit such abuse.

*10a. Should the EU consider further measures to allow airlines in financial difficulties to continue operating under special conditions?

- Yes
- No
- No opinion / Not sure

*11a. Do you see the strong environmental performance of EU aviation as providing a competitive advantage?

- Yes
- No
- No opinion / Not sure

11c. If no, why?

Fleet operated by EU airlines has a relatively higher average age than other regions.
Infrastructure at the airports is in some instances poor, and the EU ETS on intra-EU flights places a higher financial burden on European airlines, relative to non-EU airlines.

*12. Identify the three preferred options to reduce the carbon footprint in aviation?

between 3 and 3 choices

- More use of biofuel
- Improved aircraft design
- Emission Trading System, ETS
- More direct flightpaths (Air Traffic Management solutions)
- Fuel taxation in aviation
- Passenger charges (based on polluter pays principle)
- Industry initiative such as voluntarily offsetting schemes (when air carriers offer the option to passengers to pay a part of the cost of the carbon footprint of the flight)
- Other (please specify)

13a. What are the social issues that need to be addressed to safeguard the competitiveness of the aviation sector?

*13b. Do you consider that further sector-specific complementary measures are needed to address social issues in EU air transport?

- Promote sectorial social dialogue in civil aviation to reconcile different positions
- Clarify how existing EU rules apply specifically to air transport workers

- Put forward further specific social rules for aviation sector
- Other (please specify)
- No
- No opinion / Not sure

14. Taking into account the competition between transport modes, how can the EU best promote combining modes (intermodality) where it offers clear benefits in terms of convenience and for the environment?

1- Allow freedom in commercial agreements between the different modes of transport for better connections, convenience and the environment.
 2- A more harmonized consumer protection regime between transport modes.

15a. Are there EU Member States or regions where air transport connections are not sufficient?
 For each Member State or region concerned, please describe the issue(s).

*15b. How relevant do you consider air transport connections are for the overall economic development?

- Completely irrelevant
- Somewhat irrelevant
- Neutral
- Somewhat relevant
- Completely relevant
- No opinion / Not sure

*15c. If "Somewhat relevant" or "Completely relevant" please explain the type of air transport connection required.

- Relevant provided there are direct connections with other points of economic activity (e.g. national capitals)
- Relevant, if the connections are provided at right time (such as double daily, in the morning and in the evening)
- Relevant for other reason (please specify)

Please specify "Other reason"

Air transport connections are completely relevant to the overall economic development as air transport connects people, countries and cultures, provides access to global markets, generates trade and tourism, forges links between developed and developing nations. Such connections create and support millions of jobs globally. For more details on the economic benefits of air transport connections please visit <http://www.iata.org/publications/economics/Documents/890700-aviation-economic-benefits-summary-report.pdf>

- *16a. A Member State, following consultations with the other Member States concerned and after having informed the Commission, the airports concerned and air carriers operating on the route, may impose a public service obligation (PSO) in respect of scheduled air services between an airport in the EU and an airport serving a peripheral or development region in its territory or on a thin route to any airport on its territory any such route being considered vital for the economic and social development of the region which the airport serves (Article 16 of Air Services Regulation (EC) 1008/2008).

Do you consider that the existing mechanism of PSO is fit for purpose?

- Yes
- No, I want PSO mechanism further expanded
- No, I want PSO mechanism further restricted
- No opinion / Not sure

- *17a. Should the EU help to make the concept of 'green airports'(*) a reality?

() Rail and in general public transport landside access to airports are becoming increasingly important. It is critical to airport route development, especially long haul, and to airport growth. More and more authorities either oblige or incentivise airport operators to improve their environmental footprint. With some 50% of CO₂ emissions of an airport being caused by landside access, public or shared transport options are crucial. "Green airports" refer in this context to airports that act on lowering CO₂ emissions of landside access.*

- Yes
- No
- No opinion / Not sure

17b. If yes, how?

- Increase parking fees which will encourage travelers to take the taxi or public transportation instead
- Provide shuttle / taxi services for travelers, which will encourage ride sharing, and thus reduce emissions
- Provide hybrid and battery electric buses
- Provide tramway to & from the airport
- Use clean fuel on airport fleet
- Provide pay-on-foot parking - which will reduce congestion on pay booths, and will reduce the emissions emitted by vehicles since the car won't be running

*18a. Growing congestion at EU airports, weather events and progress with implementing the Single European Sky have highlighted the issue of the operational performance of airports. Should the EU be doing more to address operational performance of airports?

- Yes
- No
- No opinion / Not sure

*18b. If yes, how could the EU best help to enhance operational performance of airports?

- Benchmark airport performance
- Facilitate industry-led initiatives
- Prepare a regulatory approach
- Other (please specify)

*19a. Taking into account existing EU legislation (on airport charges, groundhandling) are there improvements that could be made to help ensure that EU airports provide efficient, high-quality services to citizens and businesses?

- Yes
- No
- No opinion / Not sure

19b. If yes, please provide suggestions on possible actions or initiatives in these areas.

Expansion and development of airport infrastructure that includes making more slots available for convenience of flight times to the consumer and enhancing ATM to reduce taxiing and flying around the airport waiting for a signal to land.

20a. Should the performance-based approach() applied in the field of air traffic management under the Single European Sky policy be extended to cover other elements of the air transport industry value chain?

() Performance-based approach: development and implementation of a performance scheme involving the setting of performance targets, the monitoring of the performance levels and of the effectiveness of actions implemented to achieve those targets.*

- Yes
- No
- No opinion / Not sure

21a. The SESAR() project proved to be a successful industrial partnership. Should it be extended to cover other sectors beyond air traffic management?

() The SESAR Joint Undertaking is an initiative of the EC established by Council Regulation (EC) No 219/2007 of 27.02.2007. As the technological pillar of Europe's ambitious Single European Sky (SES) initiative, SESAR is the mechanism which coordinates and concentrates all EU research and development activities in air traffic management (ATM). SESAR will have a global impact in defining and deploying future generations of ATM. It is established as a*

public/private partnership with the participation mainly of European aviation industry (manufacturers, air operators, air navigation service providers).

- Yes
- No
- No opinion / Not sure

22a. Do you agree that the EU should intensify efforts in order to identify and implement measures which can mitigate the effects of an airport capacity crunch() ?

() Capacity crunch: A situation when airport capacity and airport infrastructure limits demand therefore preventing further growth of traffic*

- Yes
- No
- No opinion / Not sure

22b. If yes, which would be the action(s) to be taken to ensure that additional airport capacity can be made available where it is required?

- Better identification of airport capacity hotspots
- Benchmarking of progress in addressing airport capacity hotspots
- Other (please specify)

23. In aviation security(*), there is often a compromise between providing a smooth and efficient experience for passengers and ensuring passenger security.

What areas of aviation security do you consider not currently providing a satisfactory balance?

() Aviation security means the combination of measures and human and natural resources intended to safeguard civil aviation against acts of unlawful interference*

- Passenger flow/Facilitation
- Proliferation of security regulations and measures between states:
- Carrying liquids
- Passenger/hand luggage screening process (i.e. taking off shoes or not, taking off electronic devices from handbag or not, switching on/off electronic devices or not, etc...)
- Non-recognition of security measures between states i.e. re-screening of already screened transit passengers
- One size fits all, no risk based screening

24. Do you wish to raise any other points regarding to airport security?

*25a. Do you believe that current rules under [Directive 93/13](#) on unfair contract terms are sufficiently well applied in the air transport sector?

- Yes
- No
- No opinion / Not sure

26. Mention up to **three** technological developments and advance innovative concepts that you expect will transform the aviation sector in the next 10 years.

*27a. Are there areas in which more should be done at EU level to ensure that EU airports provide efficient and quality services to people and businesses?

- Yes
- No
- No opinion / Not sure

27b. If yes, please provide suggestions on possible actions or initiatives under these areas.

1- More self-service options

2- More efficiency in security measures that would ensure security demands are met yet to reduce the inconvenience security checks are causing the public.

28. Do you think that airlines and airports should intensify efforts towards the deployment and promotion of electronic services related to air transport (such as innovative IT solutions like e-tagging of luggage, electronic ID, etc.)?

Other questions

29. Please refer to any studies or documents that you think are of relevance for this consultation, with links for online download when possible.

30. Please refer to any successful initiatives at regional, national or international level related to aviation that could support the Aviation Package?

Consumer Protection regulations in Singapore and Australia. Please check the following link for reference:
http://www.icao.int/Meetings/atconf6/Documents/WorkingPapers/ATConf6-wp79_en.pdf

31. Are there any other issues you would like to highlight in relation to this initiative?

32. Do you wish to upload any document to support your contribution to the consultation?

- **d0e89726-0d9b-4574-bfda-af08a6278671/Attachment to AACO Response to EC Consultation on Aviation Package.docx**

Useful links

About this consultation (http://ec.europa.eu/transport/modes/air/consultations/2015-aviation-package_en.htm)

Background: Why an EU aviation strategy?

(<http://ec.europa.eu/transport/modes/air/consultations/doc/2015-aviation-package/background.pdf>)

Contact

✉ MOVE-AVIATION-PACKAGE@ec.europa.eu

Additional Comments on Specific Questions for Elaboration

C1. The Commission poses the question of what is important to improve the competitiveness of the EU aviation industry. We have submitted answers to the different areas the EC stipulated as options in this question and we would like to elaborate on our answers as follows:

- 1- Regulatory harmonization is important on a global scale especially when such harmonization would help all airlines, not only those of the EU, to better compete and provide better services to the consumer as proliferation of regulations has proven to be burdensome and confusing to the airlines and their customers. Also, if any harmonization is to be done on a bilateral basis it should be agreed upon mutually and not imposed by one side on the other. Harmonization does not mean requiring an identical regulation in the third country, it rather means adopting regulations that do not conflict and that do not result in confusion to the relevant stakeholders and their customers. We reiterate that such harmonization better be achieved at a global level under ICAO umbrella especially when it comes to regulations related to consumer protection.
- 2- The more access airlines have to markets in third countries the more opportunities for operations and hence the airlines would have better chances to offer more convenient global connections for the consumer, whilst benefiting and stimulating the economy.
- 3- Access to financing is also important however only where and when it is needed. Financing airports to enhance the infrastructure and solve the shortage in airports' capacity is one example of needed financing.
- 4- Four very important areas that would improve EU aviation sector competitiveness are airport capacity, infrastructure, taxation, and air traffic management. We believe that these are the major components that the EC needs to focus on. Congested airports, gaps in air traffic management and an underdeveloped infrastructure has put EU airports and airlines at a competitive disadvantage vis-à-vis airports and airlines in other regions, while high taxation in the EU has hiked ticket prices and negatively affected demand on routes to, from and within the EU.
- 5- We also believe that a good convenient product to the consumer is the basis for enhancing the competitiveness of any airline or airport and hence to improve the competitiveness of the EU aviation industry, EU stakeholders need to look into ways to be innovative in their products and services to better attract customers. Hence innovation in all areas including but not limited to digitalization and innovation in manufacturing are considered very important areas to work on.

- 6- Safety and security are an all-time priority and hence work on these 2 areas should always be a priority. In terms of whether that would enhance the competitiveness of the EU aviation industry, we believe it would to both airlines and airports.

C2.a. In this question, the EC is comparing EU vs. non-EU carriers. We opted to answer all sub-questions in this question as “Not Sure” mainly because all non-EU carriers are not the same, thus should not be grouped together. This is also the case among EU carriers.

Q1: EU carriers do not face challenges when competing with non-EU carriers: This statement does not correctly reflect the fact that in a competitive environment there are both challenges and opportunities.

Q2: As well, generalizing in the statement that non-EU carriers have a cost advantage over EU carriers is different if we are comparing EU carriers to US carriers or to other carriers. It is however somehow true that some EU carriers have very high cost base resulting from a number of elements including but not limited to higher labor cost, higher taxes, costly regulations, older aircraft, higher consumption of fuel due to airport congestions etc...

Q3 & Q5 & Q9: Posing the question of whether non-EU carriers receive uncontrolled state subsidies and whether there is discrimination by non-EU states or non-EU service providers could be used by some less competitive EU carriers as an excuse for their misfortunes and could trigger them to throw such accusations to non-EU states and carriers in order to eliminate competition.

Q4: It is true that tax regimes in the EU are very costly to the EU airlines; however these tax regimes also apply to carriers operating from the EU.

Q6: Whether non-EU carriers may offer more attractive products is also a too general of a question as products and services are evaluated per carrier and there are awards and accolades based on consumer satisfaction that show whether carriers' products and services are attractive.

Q7 & Q8 & Q11: Also whether having a larger or smaller global network is a comparison that can be made between two carriers and not a set of EU carriers vs. non-EU carriers. Efficient management of the carriers is also different from one carrier to the other and hence generalization in such comparisons is not valid in our opinion.

3a. The EC is posing the question of in which areas should more be done to bolster the international competitiveness of the EU aviation sector. We believe that the two very important areas would be taxation and Infrastructure (which is not listed as an area of focus in the

consultation). Gaining market access in other countries is good for expansion however enhancing competitiveness should be measured in markets that the EU airlines already have access to. Some areas mentioned in this question could have an effect on competitiveness and others have minimal effect.

4. As for the instruments to be used to bolster that competitiveness, any instrument to be used should take into account the difference in social standards with other countries, should comply with procedural and substantiated legal norms, should be carefully drafted to include definitions that are fair and balanced and in line with international conventions and standards, and should not have extraterritorial application as any tool or measure that substitutes a bilateral process with unilateral action will have an adverse effect on consumer interest, bilateral relationships and the economy at large.

10a. we believe there are already state aid rules in the EC that help airlines in financial difficulties under certain conditions. In our opinion, competition and market demands should decide which airlines to survive and which not to survive.