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AmCham EU position on the airport package

Introduction

Airports and aircraft operations generate employment, infrastructure development, economic growth, and substantially contribute to the competitiveness of an EU Member State. Air transport is indeed part of the economic and social fabric of the EU and is intertwined with economic development. AmCham EU's membership – consisting of suppliers, customers and manufacturers of both aircraft and aircraft engines – would like to provide some guidance on the different elements of the proposed airport package.

Aircraft Noise

AmCham EU supports the so-called 'balanced approach' to aircraft noise management, as set out in Resolution A33-7 of the International Civil Aviation Organization (ICAO) and favours a more harmonised and consistent implementation of this balanced approach when seeking to resolve locally-identified noise issues. Therefore, AmCham EU welcomes the European Commission's proposal for a Regulation on the establishment of rules and procedures with regard to the introduction of noise-related operating restrictions at Union airports within a Balanced Approach.

A correct implementation of the balanced approach shall prevent operating restrictions, including those of a partial nature, from being discriminatory and arbitrary. The balanced approach emphasises that, when noise occurs at a specific airport, operating restrictions should not be applied as a first resort, but only after consideration of the benefits to be gained from the other three elements of the balanced approach: reduction of noise at source, land-use planning and management around airports, and noise abatement operational procedures.

AmCham EU is of the opinion that the EC proposal is the way forward for dealing with noise-related issues at airports because two important principles are adhered to:

- It provides a harmonised framework, yet takes into account local parameters. The outcome, which is taken at local level, will thus be tailored to the situation of each airport, and
- The mandatory assessment of any new measures, prior to their application, will satisfy both environmental and economic interests.

American Chamber of Commerce to the European Union
Avenue des Arts/Kunstlaan 53, 1000 Brussels, Belgium
Telephone 32-2-513 68 92 Fax 32-2-513 79 28
Email: info@amchameu.eu

Secretariat Point of Contact: Leah Charpentier ; leah.charpentier@amchameu.eu +32 2 289 1015

Furthermore, AmCham EU sees the possibility to scrutinise any outcome resulting from an ill-followed procedure as a guarantee to all stakeholders that their rights are being fully and objectively respected.

However, AmCham EU has strong reservations about the proposed change in the definition of marginally compliant aircraft (moving from Chapter 3 minus 5 EPNdB to minus 10 EPNdB). AmCham EU is of the view that having a global standard for aircraft noise as defined at the ICAO Committee on Aviation Environmental Protection (CAEP) process, combined with the natural economic motivations of newer aircrafts providing lower operating costs, results in a virtuous cycle of reduced aircraft noise without economic distortion. Any text which seeks to deviate from internationally adopted standards for a global industry like aviation risks leading to instability and undermining the role of ICAO as a standard setting entity. In addition, such a move could create conflicts with other regions in the world.

Groundhandling

Under the current Directive 96/67/EC, EU Member States have only modestly introduced market liberalisation in groundhandling services – chiefly in passenger traffic and mostly with two competitors only. AmCham EU welcomes the further opening of the groundhandling market in order to accommodate enhanced flexibility and quality of service. At the same time, new groundhandling rules should support a reduction of administrative burden, user costs and congestion, as well as support safety and security.

In addition, AmCham EU is of the opinion that new groundhandling rules should take into account the characteristics of different groundhandling activities and would like to illustrate this point with two concrete examples which raise concern among the AmCham EU membership:

- a. The (current as well proposed) definition of self-handling, especially if applied to cargo operators, is too restrictive and not in line with today's reality. Therefore, AmCham EU is in favour of broadening the definition of self-handling to include cargo integrators (providing door-to-door transport) when groundhandling is performed by aircraft dedicated to the integrators' network, irrespective of whether the aircraft is owned or leased and whether it is operated by an air carrier owned by the integrator or by an affiliated third party.
- b. The proposed interpretation of "supplier" may not consider specific qualities that apply to fuel handling in aviation. Further clarification is warranted as aviation fuel suppliers may be legally incorporated as a joint venture, but they operate as individual fuel suppliers, offering aviation customers more choice than currently accounted for in the proposed Regulation.

Finally, AmCham EU strongly opposes the idea that the European Commission should set minimum quality requirements for ground handling activities, insofar as they go beyond safety and security. Minimum quality requirements should be agreed upon among airlines and their ground handlers.

Slot allocation and airport capacity

Regulation 95/93/EC ensures the stability of take-off and landing slots and creates business certainty for operators. Any changes to the current Regulation will lead to a re-allocation of existing slots to different operators on different routes – with additional administrative costs and without proven benefit to the operators or their customers.

AmCham EU is not in favour of revising slot-allocating mechanisms, not least because allocation problems are mainly due to a lack of airport capacity.

AmCham EU therefore supports any European Commission initiative that leads to capacity increase at EU airports as long as it takes into account the interests of all players. A combination of infrastructure investment and a timely and sound implementation of the Single European Sky would solve problems linked to capacity. Finally, AmCham EU could not support an increase in daytime capacity to the detriment of night operations.

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AmCham EU speaks for American companies committed to Europe on trade, investment and competitiveness issues. It aims to ensure a growth-orientated business and investment climate in Europe. AmCham EU facilitates the resolution of transatlantic issues that impact business and plays a role in creating better understanding of EU and US positions on business matters. Aggregate U.S. investment in Europe totaled \$2.2 trillion in 2010 and directly supports more than 4.2 million jobs in Europe.

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