

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

*1b. Please identify clearly which organisation or association you represent?

European Passengers' Federation

*2a. Please indicate if your organisation is registered in the [Transparency Register](#).

- Yes
- No

***2b.** Please enter your registration number in the Transparency Register
(*numbers only*)

5282960910737

***3.** First name

Christopher

***4.** Last name

Irwin

***5.** Address

Kortrijksesteenweg 304

***6.** City

Gent

***7.** Email address

christopher.irwin@epf.eu

***8.** Please indicate your country of origin

Belgium

***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 checked="" type="radio"/> Organisation representing consumers | <input type="radio"/> Organisation representing environmental / climate stakeholders |
| <input type="radio"/> Other (please specify) | |

*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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Market access	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Access to financing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Airport capacity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>

Please specify "Other"

Clear, fair, consistently enforced and consumer-focussed passenger rights

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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Non-EU carriers have cost advantage vs. EU carriers (including lower labour cost)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Non-EU carriers receive uncontrolled state subsidies	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Non-EU carriers enjoy a more favourable tax regime than EU carriers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*There is a discrimination by non-EU States or non-EU service providers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

*Non-EU carriers offer more attractive products and services than EU carriers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input 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 type="radio"/>	<input type="radio"/>

*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 than EU carriers
- Other (please specify)

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

Uneven playing field with other modes re taxation within EU leading to inter-modal market distortions.

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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Regulatory harmonisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Effective dispute resolution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Fair competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Safety and security standards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input 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"

Once again, statements risk meaningless generalisations or of being interpreted wrongly (e.g. we believe that more rigorous safety and security standards are required globally, with no diminution in EU or we believe that there needs to be a level playing field between modes in matters of taxation within the EU in order to avoid market distortions). Taxation issues are particularly important here: the absence of taxes on aviation fuel (and, in many cases, exemption from VAT) already cause significant market distortions to the disadvantage of more sustainable competitive modes such as rail. EPF strongly advocates a taxation regime that applies without discrimination to all transport modes and which also reflects the 'polluter-pays' principle. We do not accept that this would necessarily put European airlines at a disadvantage since non-European competitors on routes involving European airports should also be caught in such a regime.

*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)

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 checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>*Cooperation on research and innovation</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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.

North America, Japan, China, Australasia, Middle East

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

We believe that there is a strong case for seeking to secure an aviation fuel taxation regime internationally in the medium term.

*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?

EPF considers that market opening and fair competition both globally and between competing modes generally provides more satisfactory outcomes for passengers, but liberalisation must take account of the need for clear, fair and effective regulation to deal with market failures.

7c. How?

The use of multilateral agreements that demonstrably place enhanced passenger satisfaction as the primary outcome to be achieved.

*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?

Multilateral cooperation is to be preferred to autarky; plurality and an open market is likely to generate greater innovation and responsiveness to consumer needs provided there is adequate regulation to deter any one operator exploiting a dominant position.

*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

*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

11b. If yes, how?

Consumers should be advised of the comparative environmental performance of all airlines operating in or through the EU and encouraged to exercise choice, if they wish, on the basis of this information. EU could support efforts on environmental performance even for non-EU airlines by strong CO₂- and fuel-taxation.

*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?

- Monitoring of and constraints on 'social dumping'
- Special provisions to safeguard connectivity of peripheral regions (e.g. PSO)
- Constraints on slot trading where a slot serving a service to/from peripheral region is traded in for use by a service to a non-peripheral region or place suitably served by land transport.

*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

13c. If no, why?

We are concerned that sector-specific measures may give rise to further anti-competitive distortions within the transport sector as a whole.

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?

EU funds (e.g. CEF) should be used to facilitate environmentally advantageous inter-modality - e.g. investment to encourage airports to develop as hubs for land-based medium-distance rail journeys, thereby liberating airport capacity for long-haul or socially-desirable links to peripheral regions. (Clearly such developments should complement, and not be at the expense of much-needed investment in land transport hubs to serve conurbations.) More generally, it is our considered view that inter-modality and the benefits that it can bring are likely to be most easily advanced by consistent tax treatment between competing 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"

For long distances air transport connections are necessary. For the majority of significant destinations there are sufficient connections to reach most places in EU daily. Flights that duplicate high-speed rail links are not necessary and their current viability is partly dependent on the distorting effect of the current unfair taxation regime that favours air transport over other, more sustainable, modes.

- *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

- *16b. Which actions or initiatives are necessary, if any, to facilitate the introduction of PSOs in air transport under current regime (Regulation (EC) 1008/2008)?

- Facilitate the application of air carriers for PSOs in order to attract more offers and reduce costs for public authorities
- Facilitate the setting up new operational bases by airlines
- Ensure a wider distribution of information on PSOs and tenders
- Ensure that the imposed obligations are less restrictive in order to attract more offers
- Forbid restrictions as to the used ticket distribution channel
- Express capacity obligations only in terms of total seat capacity and not as capacity per flight or aircraft
- Replace prescriptions as to aircraft type with performance based criteria, and use them only where necessary for operational reasons e.g. short runway or landing in arctic conditions)
- Promote the bundling of several routes where airlines can introduce offers for one or more routes
- Clarify rules and procedures
- When a PSO is in place, set the obligation for Member State to review periodically whether it is still justified, and if not, abolish it
- Other (please specify)
- 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?

Investment of EU funds in airports should be made conditional on each project demonstrating environmental gain and, as far as reasonably practicable, enhancement of land transportation connectivity and substitution of air haul by land haul for medium distance traffic.

*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)

Please specify "Other"

Hubbing and subbing: encouraging the development of airports as inter-modal hubs or nodes and facilitating substitution of air connections by land transportation links.

*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.

Monitoring performance of individual airports, providing comparative data on an EU website to inform consumers, benchmarking against global best practice

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

20b. If yes, which ones?

Monitoring performance of individual airports, providing comparative data on an EU website to inform consumers (including on environmental impacts such as the comparative CO2 and noise effects), benchmarking against global best practice. It would also be in the interests of consumers, as well as good for the industry generally, if complaints against airlines and airports were to be recorded and published on a regular basis, together with the results of passenger satisfaction monitoring throughout the EU.

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

21b. In what way?

The intended outputs should be clearly end-user focussed and directed at achieving better environmental, consumer and financial value. It should not be an excuse for EU investment in the sectors' vanity projects.

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)

Please specify "Other"

Hubbing and subbing: encouraging the development of airports as inter-modal hubs or nodes and facilitating substitution of air connections by land transportation links.

There is currently a real danger that the consumer benefits derived from the opening of Europe's air space and the emergence of low cost carriers is being undermined by over-expensive or unreliable surface access.

Good surface access connections with airports and with other transport hubs is vital to making better use of capacity. Transport provision needs to be viewed holistically and co-modally: more should be done to encourage airports or airline operators to work with surface transport operators to provide some certainty that, provided a passenger has allowed a reasonable time to get to the airport, the passenger would not be unduly disadvantaged if they miss their flight (or pre-booked onward connection by train or coach) if they are unavoidably delayed due to transport problems beyond their control. If you are taking a one hour flight then it is probably not reasonable to have to build in more than one or at most two hours, on top of the expected journey time, to get to the airport.

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*

Greater investment needs to be directed at the development of effective air security measures that are less intrusive and time-consuming for passengers.

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

*25b. If not, how do you think that these rules could be enforced more effectively?

- A centralised mechanism at EU level should exist in order to ensure equal enforcement of consumer legislation and a level playing field
- More coordinated enforcement actions by national authorities for EU-wide infringements (under the CPC Regulation (EC) 2006/2004 on cross-border enforcement)
- Commission guidelines on the specific application of Directive 93/13 in the air transport sector
- Specific aviation legislation with regard to unfair contract terms (e.g. black list on certain terms)
- Other (please specify)

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

- Development of user-friendly inter-modal hubs
- Improvements to seamless inter-modal information provision and non-physical payment and ticketing arrangements
- reduction of middle-distance flights because of real costs and fair taxes to allow better long-distance slots

*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.

Clearer acknowledgement by EU institutions and in policies and acquis of the primacy of end-users.

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.)?

Yes - and integrate that with work in other modes.

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?

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?

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
