

An Aviation Strategy for Cargo

The EU Aviation Strategy is a welcome step towards a modern, innovative aviation sector which guarantees choice, quality, connectivity, transparency and fair competition. However, the strategy focuses primarily on air transport at a general level or from a passenger point of view. We believe that cargo-specific issues should be accorded equal importance, given the essential nature of air cargo to the European economy.

- **Open, Fair Competition**

CLECAT supports the proposal to negotiate comprehensive EU-level air transport agreements with a range of international partners, and to use these agreements to liberalise the aviation market while ensuring fair and sustainable competition. The EU and its Member States must not respond to any unfair practices with protectionist measures of their own. This would be counterproductive, unsustainable, and would only serve to limit connectivity and growth. Should evidence be found of unfair commercial practices in third countries, to the detriment of European carriers, responses must be based on clear criteria, laid down in law and communicated transparently with market operators.

- **Spread the EU's Open Skies**

While there are no traffic rights restrictions when a Community carrier operates a flight between two Community airports, as soon as an intra-EU flight continues to a destination outside the EU, the intermediate Member State may raise objections, even in cases where the third country does not. This practice should be superseded by genuine open skies through the negotiation of comprehensive air transport agreements. Cargo flights are particularly affected by this phenomenon as they are more likely to make multiple stops.

- **Review the Groundhandling Directive**

CLECAT strongly believes that the 1996 Groundhandling Directive should be reviewed, so as to fully liberalise the ground handling market and allow greater competition, a higher level of service and lower rates. A concrete proposal is therefore required from the European Commission to address this limit on efficiency. In order for such a proposal to be successful this time, a full examination of the state of the internal market is required in order to demonstrate the current constraints on capacity and efficiency and how they will be alleviated by EU action and innovation in the market.

- **Remove barriers to digitalisation**

The air cargo industry has already made great advances in digitalisation by developing the e-Air Waybill, however the deployment of innovative ICT technologies, within Europe and internationally, is still hampered by widely differing operational practices and standards. This restricts the speed of implementation and slows down innovation. The European Commission should focus on removing these barriers in order to spur greater uptake of solutions such as the e-Air Waybill, as well as efforts to digitise commercial invoices, House Air Waybills, packing lists, dangerous goods declarations, and cargo security declarations.

- **Ensure sustainable growth**

The reorganisation of European airspace, on a more efficient basis and away from national lines, will make air traffic management greatly more efficient. We urge the EU to act rapidly to put the Single European Sky into place, in order to realise the great savings for all in environmental and financial costs which it will enable. We also call for the proper implementation of Regulation 598/2014 to ensure that the ICAO Balanced Approach is fully applied to aircraft noise management decisions.

- **A risk-based approach to aviation security**

The current security climate in Europe underlines the need for a smart approach to aviation security. This includes the risk-based approach, where measures taken are most appropriate to the desired security outcome and the level of threat. Comprehensive cooperation is required between interior authorities, police, customs, intelligence and other relevant bodies, at national and European levels. The European Commission can facilitate this process. The development of globally coordinated standards for cargo security screening equipment is also required, through co collaboration with international bodies such as ICAO and World Customs Organisation, so as to enable the seamless and secure operation of the global air cargo market.

- **Keep an intermodal focus**

It is good that the Commission has devoted resources to a specific strategy for aviation. However, transport policy should not be developed in silos. The supply chain depends on smooth, efficient intermodal connections, requiring investment in modern infrastructure. Air cargo in Europe relies in particular on road feeder services replacing aircraft on shorter, intra-European routes, highlighting the importance of strong road connections for airports. This demonstrates the need for coordination on infrastructure investment between industry, the EU, national and regional authorities.