



CLECAT / ESC Position Paper in Response to the European Commission 'Airport Package'

Brussels, 19th of January 2012

On the first of December 2011, the European Commission adopted the so-called '**Airport Package**' including a communication and three legislative proposals which deal with slot allocation, groundhandling services and noise.

Competitive air freight services in Community airports are critical to the supply chains of many businesses, whether it be for the occasional user or the regular shipper of high value or perishable products. The vast majority of these services is provided by freight forwarders and logistics service providers. As users of services provided at Community airports CLECAT and ESC would like to jointly submit their common views on the airport package.

CLECAT represents the interests of logistics at large, freight forwarding, transport and Customs related services in Europe. Freight forwarders and logistic service providers master the entire supply and value chain on behalf of their clients and they do not privilege any means of transport or transport infrastructure. European freight forwarders and Customs agents clear around 95% of the cargo transported by air.

The **European Shippers' Council** (ESC) represents the freight transport interests (import and export and intra-continental, by all modes of transport) of business in Europe, whether manufacturers, retailers or wholesalers – collectively referred to as shippers. Members are drawn from national transport users' organizations, shippers' councils, a number of key European commodity trade associations and corporate members. The European Shippers' Council represents the freight transport interests of some 100,000 companies.

Noise (COM (2011) 0828)

The Commission proposed Regulation lays down rules on the introduction of noise-related operating restrictions on an airport-by-airport basis. This is being done with full respect and support of the ICAO so-called 'Balanced Approach' on noise management.

CLECAT and ESC support the approach of the European Commission to protect European citizens from aircraft noise with ICAO's 'Balanced Approach'. However, we would also like to stress the importance of the subsidiarity principle, when considering operating restrictions instead of other possible measures to reduce noise. Operating restrictions should only be applied in exceptional cases and other measures to reduce noise should first be tested to their full extent. Considering the local impact of an operative restriction the decision on such a measure should be left to the local or regional authorities, i.e. the authorities in the EU Member States should implement these rules according to national requirements. These

authorities have a better overview over the specificity of the airport, the stakeholders involved, the environmental conditions and possible alternatives to an operative restriction. We therefore support the general approach that measures against noise from aircrafts should be taken on a case-by-case basis by taking into account local specificities, while the EU retains the right to scrutinise these local decisions.

Commission and Member States authorities should also take into account that the most costly and time definite products are being transported by aircrafts - often during the night in order not to disturb other airport operations. Air cargo fulfils a crucial role in our economy. Therefore the interests and views of forwarders and shippers, as the main users of air transport services, should be considered when noise management measures are being reviewed. It is therefore unfortunate that transport users like shippers and forwarders are not mentioned as stakeholder in the consultation process, outlined in art. 5 and annex II of the proposed legislation. We also note that while "*direct, indirect and catalytic employment effects*" need to be taken into account in the cost-effectiveness analysis, the economic effects are not mentioned. This is something that the users of air freight would want to see amended when the draft legislation is being considered, for example by explicitly mentioning forwarders and shippers as part of the consultation process.

Slots (COM (2011) 08277)

ESC and CLECAT support the objective of the Commission's draft proposal which is to ensure a system of fair, non-discriminatory and transparent rules for the allocation of landing and take-off slots to allow optimal utilisation and fair competition. Where the demand of landing and take-off slots exceeds the airport capacity, a mechanism to allocate slots is needed. CLECAT and the ESC embrace market-based mechanisms for the trading of slots between airlines. CLECAT and ESC also welcome the extension of the 'use it or lose it rule', where now 85% of the slots have to be used by an airline in order to keep their respective slots. However a further increase or the total implementation of this rule would even further increase airport capacities, while allowing more airlines to enter the market, which would again foster competition, ensure maximum flexibility and reduce prices. CLECAT and ESC would therefore support a full opening of the slots allocation.

Groundhandling (COM (2011) 0824)

For cargo handling CLECAT and ESC support full liberalization of the groundhandling market, which will result in more competition, lower rates and higher level of service. Market forces should determine the number of handlers an airport can host. The more open the market will become the better it should be for the quality of service and price. All companies having the possibilities and having obtained the needed licenses should be allowed to offer their services. CLECAT and ESC welcome nonetheless the increase in the minimum number of groundhandlers from two to three per airport as a step in the right direction. The minimum quality standards should, however, be monitored by the 'ground coordinator'.

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