Position Paper

of the bmvit to the European Commission

Follow-up to the ECAC/EU Dialogue 2014

To be submitted to the EU Commissioner for
Transport Violeta Bulc

bmvit IV/L1
Aviation Road Map 2020, Committee
21 October 2014

Ministry for Transport, Innovation and Technology

Background

This year's stakeholder discussion meeting of the European Civil Aviation Conference and the European Commission (ECAC/EU Dialogue) on 3/4 July 2014 in Vienna focused on the competitiveness of the European air transport sector in a global environment[1]. Discussions explored both the positive development of Europe's air transport sector in the last 20 years (above all as a result of liberalisation) and examined the current challenges that make it harder for the European air transport industry to remain competitive. A list of things that can and should be done to bolster European competitiveness was identified. These recommendations to industry and regulators were summarised in the conclusions to the ECAC/EU Dialogue 2014[2].

The Position Paper was approved by the Austrian air transport stakeholders on 21 October 2014 at a meeting of the Road Map Committee.

Improving the Competitiveness of the European Air Transport Sector

Austria's national aviation strategy (Aviation Road Map 2020[3]) defined improving the competitiveness of the Austrian aviation industry as a central goal. Many of the current challenges require common solutions to be found at the European level (e.g. fair competition, ownership & control, overregulation). Against this background, Austria supports all recommendations made in the ECAC/EU Dialogue that will effectively strengthen European aviation.

Austria calls upon the European Commission to accord the highest priority to developing a strategic vision for the air transport sector at the European level and to take account of and to promote the individual recommendations of the ECAC/EU Dialogue in the Commission work programme.

In particular, emphasis should be given to the significant contribution made by air transport to economic and locational development, to connectivity and to protecting jobs and creating employment. This contribution should be communicated more effectively in future.

Key Areas/Priorities/Demands

Austria wishes that the following issues form a key area of a future European strategy and that they are included in the Commission's future work programme:

1. Avoid Overregulation

A glut of legislation is becoming an increasing problem for business and citizens alike. There is an urgent need therefore to avoid excessive regulation when drafting new and revising existing legislation.

- Austria requests the European Commission to subject new legislation to a detailed cost-benefit analysis and to introduce procedural simplifications to avoid excessive regulation.

In a number of areas, there are divergences in how regulations are applied by Member States and also cases where they cannot be enforced properly. The divergences in how regulations are applied within the European Union can lead to unequal treatment and must be avoided (e.g. Regulation 1008/2008).

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[1] Title: "European air transport competitiveness – The way forward in a global environment"
[2] ECAC Working Paper at the last meeting of the Directors General in Dubrovnik, DGCA/63(SP)-DP/9 – Conclusions of the ECAC/EU Dialogue
[3] Road Map Luftfahrt 2020, http://www.bmvit.gv.at/en/service/publications/transport/downloads/aviation_roadmap2020.pdf

- Austria calls for further harmonisation in respect of the application and enforcement of existing EU regulations.

2. Current Challenges: Ownership & Control, Fair Competition, Social Aspects in Aviation

There is an urgent need for discussion in these areas. Aviation is an extremely dynamic transport sector frequently characterised by very rapid change. This leads to new challenges:

Increasingly fierce competition within and outside the European Union is creating new business models in the airline industry. Many airlines require additional investment despite and because of restructuring efforts. Doubts as to the existence of a global level playing field make fair conditions for a competitive European air transport even more important.

- Austria calls upon the European Commission to continue intensive and transparent discussions on ownership & control and on social aspects in aviation with the involvement of all concerned (authorities, stakeholders, policymakers).

- In connection with fair conditions for competition, Austria advocates ensuring the enforceability of the relevant EU regulations and hence the rapid presentation of a revised Regulation 868/2004 so as to have a suitable instrument available. Austria furthermore calls upon the European Commission to engage in urgent consultations with those states where there are doubts regarding a level playing field.

3. Avoid Additional Burdens

The European air transport industry faces increasing cost burdens and fears competitive disadvantages as a result. Additional financial burdens must therefore be avoided.

- Austria demands that when new regulations are drafted, the impact they will have on the competitiveness of the European aviation industry must be analysed and taken into consideration accordingly (e.g. ETS, Security).

Summary

Austria calls upon the European Commission to accord the highest priority to developing a strategic vision for the air transport sector at the European level and to take account of and to promote the individual recommendations of the ECAC/EU Dialogue in the Commission work programme. The economic importance of air transport in particular must be stressed.

Austria calls for:

1. Avoid Overregulation
- Cost-benefit analysis for new legislation
- Simplified procedures
- Harmonisation of the application and enforcement of existing EU regulations (e.g. Regulation 1008/2008)

2. Current Challenges: Ownership & Control, Fair Competition, Social Aspects in Aviation
- Greater and transparent discussion of ownership & control and social aspects
- Ensuring the enforceability of EU regulations (e.g. Regulation 868/2004)
- Increased efforts to ensure fair competition

3. Avoid Additional Burdens
- Analysis of impact on the competitiveness of European air transport when drafting new legislation (e.g. ETS, Security)