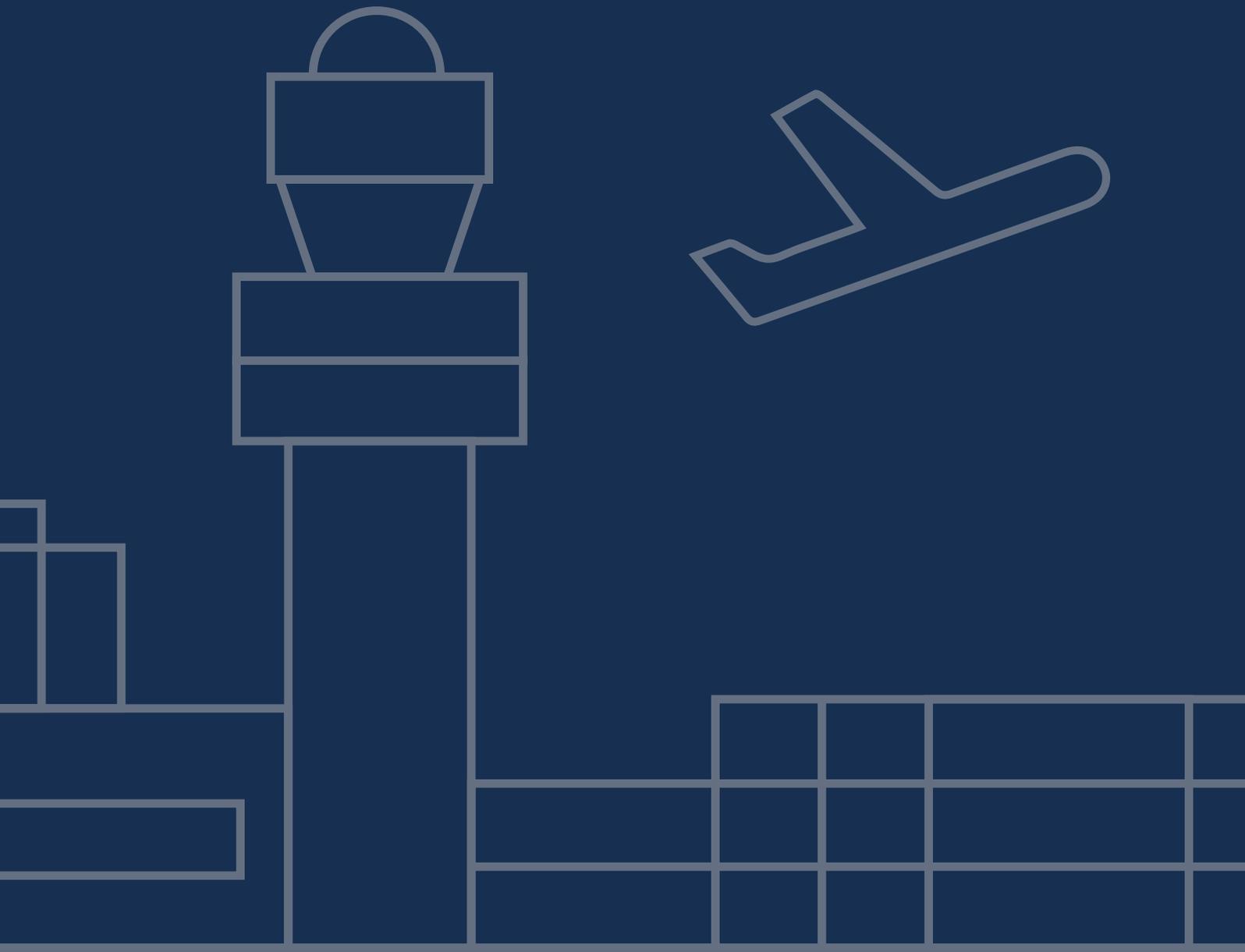




# POLICY BRIEFING





## CONNECTIVITY

AIR CONNECTIVITY  
AIR TRAFFIC MANAGEMENT (ATM)  
AIRPORT CAPACITY  
AIRPORT CHARGES  
AIRPORT SLOTS  
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## SUSTAINABILITY

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NOISE  
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## SECURITY & SAFETY

AVIATION SECURITY: THREATS TO CIVIL AVIATION  
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# CONNECTIVITY



# AIR CONNECTIVITY



## WHAT IS IT?

[ACI EUROPE's annual connectivity reports](#) provide indices for direct, indirect and hub connectivity.

- **Direct connectivity:** These are the direct air services available from the airport – measured not just in terms of destinations, but also factoring in the frequency of flights to the same destination.
- **Indirect connectivity:** This measures the number of places people can fly to, through a connecting flight at hub airports from a particular airport.
- **Airport connectivity:** This metric sums both direct and indirect connectivity from the airport – thus measuring the overall level to which an airport is connected to the rest of the World, either by direct flights or indirect connections via other airports.
- **Hub connectivity:** This is the key metric for any hub airport –big or small. Essentially, it measures the number of connecting flights that can be facilitated by the hub airport – taking into account a minimum and maximum connecting times, and weighting the quality of the connections by the detour involved and connecting times.

## WHY DOES AIR CONNECTIVITY MATTER?

The importance of air connectivity is summed up in one simple statistic: A +10% increase in air connectivity comes with a +0.5% increase in GDP per capita. Therefore, European policy should take steps to support the development of air connectivity. Key actions are to continue to seek liberal open skies agreements and take actions to address capacity in the air (Air traffic Management) and on the ground so that we can ensure connectivity growth. Efforts must accelerate to deliver the Single European Sky and to reform slot allocation (to ensure a more effective & competitive use of airport capacity). At the same time, airport economic regulation should incentivise investment into capacity enhancement.

## RECENT DEVELOPMENTS

After a strong growth in direct connectivity in recent years (+29.7% since 2009), 2019 is seeing rather modest gains (+1.2%). This is mainly due to the combination of airlines becoming risk averse in terms of network development, airline consolidation (which tends to hurt air connectivity and limit airline competition), airport capacity constraints and ATM inefficiencies.

This highlights the importance of increasing vital investments in airport infrastructure and of further opening market access through negotiated agreements with the EU's main trading partners.

The last ten years have seen strong growth in direct connectivity in the EU from low cost carriers (+136% increase in direct connectivity market share) while full service carriers have contracted their connectivity offer (-7%). This means that European airports are increasingly in competition to attract air services from ultra-flexible and footloose LCCs shopping across Europe for the best airport route development deals. The increase of indirect connectivity by +55.5% over the last 10 years in Europe reflects a significant number of global destinations opened to Europeans with easier & more effective access from their home airports via both European and non-European hubs .

Europe's hub airports hold 3 of the top 5 positions for Global Hub Connectivity, up from only 2 in 2009 – demonstrating the vitality of Europe's hubs and their prominence in global air connectivity. Within Europe, the gains in hub connectivity have come from 'smaller & niche hubs', pointing to an increasingly diversified and competitive market for transfer passengers.

# AIR TRAFFIC MANAGEMENT (ATM)



The Single European Sky remains incomplete, with European airspace continuing to be fragmented and susceptible to record flight delays caused by inefficiencies and lack of capacity. [Successive regulations since 2004](#) have aimed to defragment Europe's airspace and improve performance levels, yet national boundaries remain evident in the air and the air traffic management system (ATM) is increasingly unable to handle current and future traffic levels.

Summer 2018 saw the worst airspace delays on record. [According to EUROCONTROL](#), en-route delays more than doubled in July-August 2018, with the average delay per flight increasing by +192%. Overall, 20% of operated flights were delayed in this period. The main causes were a lack of air traffic controllers and other Air Traffic Control (ATC) capacity issues (61%), weather (30%) and strikes/other disruptive events (9%). These inefficiencies led to an additional +5.2% of CO<sub>2</sub> emitted by aircraft in Europe in 2018.

Strike actions in some Member States were partly at cause for this particular situation, but the primary cause remains a chronic lack of capacity in Europe's ATM system. Mitigation measures developed for summer 2019 are intended to ease the situation, but a long-term strategic approach to modernising Europe's airspace is essential in order to sustainably accommodate traffic growth.

As critical nodes in the airspace network, airports are acutely affected by airspace capacity shortages and disruptions. ATM delays have an impact on the ground all the way into the terminal building, due to the cascading impact of delayed aircraft on demand for and use of airport infrastructure. This deteriorates the passenger's airport experience and the quality of airport infrastructure and services. Furthermore, if en-route delays result in aircraft landing or departing during airports' night restriction hours, then the airport's very license to operate can be called into question.

[ACI EUROPE considers](#) that Europe's airspace capacity shortfall will only be overcome through a strategic, network-based, coordinated and consolidated approach. This requires collaboration, coordination and consolidation within airports, and between airports and the airspace network. Successful implementation of this approach would serve to optimise both airspace and ground use, maximise capacity to meet demand, make investments more efficient and deliver efficient air connectivity and improved quality for people, goods and regions.

This means that the next set of Single European Sky (SES) proposals must serve the goals of increasing network performance, balancing capacity and demand, and recognising airports as equal partners in the network. The recommendations of the [April 2019 Wise Persons Group report](#) are a good start in this respect, and it will be important to maintain a full role for airports, and other operational stakeholders, in the realisation of the next phase of the SES.

A more centralised approach to delivering the SES may therefore be what is required, provided that airports are fully involved in its management and delivery, and that local capacity needs are not neglected in a pure focus on the network.

What is clear is that the next stage of the SES must come soon and ensure a long-term sustainable solution to Europe's airspace capacity problems, which fully recognises airports' critical roles within the airspace network.

# AIRPORT CAPACITY



According to the 2018 [EUROCONTROL Challenges of Growth report](#), demand for air traffic in Europe is expected to grow by at least 53% by 2040 compared to 2017 levels. While EUROCONTROL's predictions imply a slower rate of growth compared to the 20 years up to 2008, and the report notes a planned 16% increase in capacity across 111 European airports, it is predicted that by 2040 there will be 1.5 million more flights in demand than can be accommodated, equating to 8% of demand and 160 million passengers. At least 16 European airports will be operating at near full capacity for most of the day, compared to 6 in Summer 2016.

Airports are taking numerous actions to resolve this capacity gap, but are often constrained in their room to manoeuvre, sometimes literally. This is particularly the case with regard to physical capacity expansion, where lack of space, environmental concerns and the impact on neighbouring communities makes such a solution often physically and politically complicated. Airports' ability to maximise their capacity on the ground is also affected by capacity in the air, where a shortage of airspace capacity had led to record delays, underlining the urgent need for the Single European Sky.

Airport capacity may also be optimised through slot allocation, however the slot allocation process in Europe, as governed by Regulation 95/93, requires reform in order to ensure better use of available capacity (see separate paper on Slots). New air traffic management (ATM) technology and procedures offer promising advances in runway throughput, and require investment and a holistic view incorporating airspace and physical airport capacity in order to deliver the most benefits. The Single European Sky ATM Research programme (SESAR) [is leading the way in promoting such solutions](#), and is supported by airports through active participation in its work.

Coordinated airport operations are also a critical element in maximising airport capacity. In order to allow airports to operate existing capacity to the best extent possible, all stakeholders operating at an airport need to be [involved and synchronised](#). Otherwise, each stakeholder determining or contributing to airport capacity will try to optimise capacity only within its domain. This would be suboptimal for the entire airport system as, e.g., runway capacity might neither be aligned to terminal capacity nor to apron/stand capacity. Stakeholder operations should be based on shared data and information through an integrated airport operations plan (AOP) and Collaborative Decision Making. Many airports are implementing such Collaborative Decision Making, which should be encouraged and supported as a key means to optimise capacity.

It is therefore critical that airport capacity be considered as a central strategic element of any aviation policy initiative. Ensuring that the aviation system is capable of sustainable growth is the priority of the airport sector and should be a key part of future EU transport policy.

# AIRPORT CHARGES



## EVALUATION AND IMPACT ASSESSMENT OF THE EU AIRPORT CHARGES DIRECTIVE (2009/12)

During the coming years, policy-makers can help ensure that Europe's airports are able to provide the capacity needed to meet demand for air travel. There are two actions to take:

- Protect the current Airport Charges Directive so that investment in airports is facilitated.
- Allow the competitive space between airports to grow by surveying airline dominance.

The European Commission's Directorate-General for Mobility and Transport (DG MOVE) in 2016 started the procedure for an evaluation and impact assessment of the EU Airport Charges Directive.

The EU Airport Charges Directive entered force in 2009 and applies to airports with more than 5 million passengers per annum, as well as the largest airport in each EU member state. The Airport Charges Directive requires airport operators to follow principles of economic regulation on consultation, transparency, non-discrimination and offers users a resort mechanism for disputes on the charges.

## AIRPORTS COMPETING FOR BUSINESS AND FACING DOMINANT AIRLINES

An airport, like any commercial entity, must earn revenue to cover its financial and economic costs of operation. Airports typically earn revenue from two streams: the aeronautical business and non-aeronautical (commercial) business. The former is frequently called 'airport charges' and includes landing charges and passenger services charges. Government taxes are not airport charges.

Today, airports are highly competitive businesses looking to gain new airline services and passengers. This is because of the liberalisation of Europe's air transport market, a process which started in 1992. Airport competition is pan-European, because airports are competing with other airports across Europe to attract new airline services, as much as they are competing to bring in passengers from the local catchment area.

A [2017 study on Airport Competition](#) found that the entry of low cost airlines into the largest airports in Europe, the increase in number of flights to Gulf and Turkish hubs, and changes in services available to passengers allowing them to take advantage of actions such as creating their own 'self-connection' increased competitive pressures on airports.

## PEOPLE TRAVELLING BY AIR IN EUROPE SHOULD HAVE ACCESS TO ADEQUATE AND QUALITY AIRPORT INFRASTRUCTURE

Even with the current Airport Charges Directive, airlines do not accept that they need to pay for the infrastructure they use. But this is what the [Commission's user pays principle](#) is about. Like it or not, we are in Europe – not in the US and not in the Middle East. That means that public financing is not available – and that it is even not permitted by our State aid rules.

Our key challenges in European aviation are not about airport charges, but about ensuring that the appropriate capacity to meet demand is provided and fair competition throughout the aviation value chain is allowed, thereby ensuring affordable connectivity for consumers. EUROCONTROL's 2018 *Challenges of Growth* report found that by 2040 the lack of airport capacity will result in 1.5 million foregone flights and 160 million foregone passenger voyages, a demand gap of 8%. Private investment, based on a stable regulatory framework, is required to provide the capacity needed.

# AIRPORT SLOTS



Airport slots are used to manage congestion and allocate demand for flights in a way which optimises the use of airport capacity. At airports where demand outstrips capacity, an airline wishing to operate is granted a slot by an independent coordinator, giving the right to take off, land and use airport infrastructure for the route and day requested.

Europe's airports are particularly affected by this regime, with Level 3 airports (those where a slot is required in order for an airline to operate) most prevalent in Europe. The slot allocation system in Europe is governed by [Regulation 95/93/EEC](#), which is influenced by the [Worldwide Slot Guidelines](#). Two of the central planks of the slot regulation are the "80/20 Rule" whereby if an airline uses a slot at least 80% of the time in a season, it will retain it for the following equivalent season (Summer or Winter), and the New Entrant Rule which grants some priority to airlines which would bring a competitive challenge to incumbents at an airport.

A [proposal](#) to revise Regulation 95/93 was tabled in 2011, which would have updated the regulation to openly allow airlines to buy and sell slots from one another, broaden the definition of new entrant so as to boost competition by allowing more airlines to fall into its scope, increase the threshold for grandfather rights, and strengthen the independence and transparency of the coordination process. The introduction of a slot reservation scheme would have given greater incentive to airlines to use the slots which they have been allocated.

Despite offering some promising improvements to the slot allocation regime in Europe, the 2011 proposal was heavily watered down by both Parliament and Council, and remains blocked to this day due to Member States disagreement. The outdated 1993 Regulation therefore remains in force, and its revision is a key priority for Europe's airports.

ACI EUROPE believes that the following elements should form part of a revised Regulation in order to optimise airport capacity and promote airline competition at airports:

- Greater transparency in the slot allocation process.
- More scope to ensure that slot allocation takes into account the economic & connectivity needs and strategies of airports and their local markets.
- Ensuring that airlines make full and proper use of the slots allocated to them.
- Strengthening the new entrant rule so as to deliver greater competition at Europe's airports and more choice for passengers which caters to their needs.

Taking such measures will ensure that the slot allocation system better reflects the available capacity at European airports and is more suited to the current and future air transport market.

# BORDER CONTROL



## START OF OPERATIONS FOR THE ENTRY/EXIT SYSTEM AND EUROPEAN TRAVEL INFORMATION AND AUTHORISATION SYSTEM (ETIAS)

Regulations [2017/2225](#) and [2017/2226](#) establishing an Entry/Exit System (EES) to register entry and exit data and refusal of entry data of third-country nationals crossing the external borders of the Member States and determining the conditions for access to the EES entered into force on 29 December 2019.

Regulations [2018/1240](#) and [2018/1241](#) on the establishment of the European Travel Information and Authorisation System (ETIAS) entered into force on 9 October 2018.

These regulations follow the Council's call for legislative measures aiming at strengthening the protection of the EU's external borders. Although they have entered into force, the European Commission will decide on the implementation date once a number of technical conditions are met, possibly in 2021.

ACI EUROPE would like to call the attention of Regulators on the following aspects:

- The adopted regulations, in line with the Schengen border Code, clearly establish that border control is the responsibility of Member States. Member States should deploy appropriate staff and resources in sufficient numbers to carry out border control at the external borders. Moreover, specific articles in the regulations provide additional funding for Member States to comply with the newly imposed requirements.
- Under the [Internal Security Fund \(ISF\)](#) Member States received a basic allocation of €3.8 billion (period 2014-2020). The instrument Borders and Visas, aimed at supporting Member States in the management of the EU's external borders also covers the development of new IT systems that support the management of migration flows across the external borders.
- ACI EUROPE has noted a lack of consistency in the use of these funding mechanisms by Member States. Indeed, while some Member States finance the required infrastructure using European funding, others require European airports to fully bear these costs.
- The current lack of consistency and transparency in the use of European funding should be addressed and the European Parliament could play a vital role in this regard.
- Finally, and with reference to the start of operations of the EES and ETIAS, it should be noted that the lack of preparedness of some Member States and the requirements for public procurement could delay the implementation date.

# EXTERNAL RELATIONS



International air transport is heavily regulated. All traffic rights (right to land and take off, to transport passengers and cargo) are defined in international agreements signed at governmental level (EU or national). The evolution of air transport in the last decades regarding ownership and control of airlines (with the notion of Community carrier) and airports (which are considered in Europe as economic enterprises) has led to the necessity for airports to raise their voice regarding air agreements. The time when the State's general interest was fully aligned with the interests of national carriers and airports they owned is over and Air Transport Agreements should reflect the strategic relevance of aviation and the positive externalities that connectivity brings to the economy. They should be based on the full spectrum of interests involved, in particular consumers, businesses that rely/depend on aviation and job creation. Air transport – as any mode of transport – is just a tool, not a goal in itself.

## EXTERNAL RELATIONS AND CONNECTIVITY

For airports, increasing the number of destinations served and attracting more passengers and cargo through the development of their route network and the diversification of their airline portfolio is a core business imperative. It is also central for their societal benefits – i.e. maximising connectivity for their communities and supporting economic growth and job creation. Airports are firstly “locations” and have common goals with their region, which often leads to a common approach between airports, local and regional entities to attract airlines, demonstrate the economic value of a route, provide incentives and retain the service, given airlines' propensity to relocate in search of additional revenues.

Research on the relationship between international air services and the location of large firms shows that a 10% increase in supply of air service at an airport is associated with a 4% increase in the number of large firms headquartered nearby. Furthermore, the availability of non-stop intercontinental flights is a significant criteria in choosing headquarters locations (along with other economic, business, labour and tax factors).

## OPEN SKIES – AN AGENDA FOR GROWTH & DEVELOPMENT

Today, passengers want the ability and freedom to fly. They want choice both in the route and the carrier to their destination depending on their priorities (direct flight, cheap ticket). The airport for its part will seek to develop connectivity, multiply routes and carriers and offer the greatest possible choice to passengers. Liberalisation means more choice for consumers, which in turn leads to traffic growth but also economic benefits for the Regions. Indeed, beyond airports and the tourism industry, European consumers have benefited from affordable air connectivity, within and outside the EU. Air connectivity supports economic growth: a 10% increase in air connectivity yields a 0.5% increase in GDP per capita. Airports thus support the further liberalisation of air transport.

## EUROPEAN AVIATION GLOBAL POSITION AND FAIR COMPETITION

International air transport is being reconfigured as a result of globalisation and the economic shift to the Asia Pacific region as well as the rise of emerging countries, challenging European aviation. This is both a challenge and an opportunity to take a leadership position in liberalisation to enhance the competitiveness of Europe. By negotiating at EU and national levels air agreements can promote free markets and liberalised Ownership & Control provisions, while imposing achievable regulatory convergence objectives, including fair competition clauses based on equality of opportunities.

# PASSENGER RIGHTS



## REVISION OF REGULATIONS 261/2004 AND 2027/97

Regulation [261/2004](#) provides the common basic framework for information, assistance, reimbursement, rerouting and/or compensation under certain conditions in the event of denied boarding, cancellation or long delays of flights. Regulation [2027/97](#) transposes the Montreal Convention into European law.

These two regulations and the international conventions do not impose any legal obligation on European airports, based on the principle that a passenger's primary relationship is with the air carrier, with whom they have a transportation contract.

The closure of European airspace due to the threat of volcanic ash, extreme weather conditions, Air Traffic Control (ATC) strikes and carriers' bankruptcies – amongst other events – highlighted the limitations of Regulation 261/2004. Similar situations of unprotected passengers also occur in Europe on a regular basis, in cases of denied boarding, cancellation of flights or long delays not associated with extraordinary circumstances. In some cases, air carriers do not fulfil their obligations and fail to offer passengers the assistance to which they are entitled. Consequently, European airports often end-up assisting stranded passengers.

**Therefore, the main problem in the area of air passenger rights arises from the current lack of enforcement of the existing rules and the many different interpretations of the legislation by air carriers.**

In 2013, the European Commission submitted a proposal for a revision of these regulations. The European Parliament adopted its [report](#) in February 2014 (rapporteur Georges Bach, EPP-LU) but the Council was not able to reach an agreement on its position. **The European Commission is currently undertaking a *Fact-finding Study on the protection of air passenger rights*, that could eventually lead to a withdrawal of the proposal.**

ACI EUROPE is concerned that a withdrawal of the proposal could result in an ineffective protection of air passenger's rights. The following points were noted in the Parliament's position and should not be neglected:

- The presence of an air carrier's point of contact at the airport empowered to assist, re-route and compensate passengers – including in cases of insolvency and/or revocation of the operational license – is an absolute pre-requisite for the effective implementation of the legislation.
- The role and responsibilities of each entity (air carriers, ground handlers, airport managing bodies) should be clear to avoid confusion for the passenger.
- Unreasonable restrictions on cabin baggage allowance by some carriers undermine the passenger experience and damage a wider economic activity. The lack of recognised passenger rights in relation to this issue has led to very restrictive and changing practices by some carriers limiting passengers to carry a single piece of hand baggage on-board and charging them for any additional item, such as airport shopping. These restrictions undermine the passenger experience, causing emotional distress and anxiety at boarding gates where passengers are forced to choose between paying penalties or forfeiting possessions. The Parliament's position is that passengers should be allowed to carry in the cabin a reasonable number of essential personal items or belongings including airport shopping at no extra cost, in addition to the prescribed cabin baggage allowance.

# SUSTAINABILITY



# CLIMATE CHANGE



There is no doubt that the Climate Emergency is one of the biggest challenges of our time – especially for aviation. While the climate footprint of individual aircraft has improved dramatically over the last decades, this development has been outpaced by growth in air traffic. Aircraft emissions in Europe have increased by 16% since 2005 and [are projected to increase by 21% by 2040](#).

Airport-related emissions are estimated to represent 2% to 5% of global aviation emissions. Nevertheless, ACI EUROPE and its members have actively addressed the carbon footprint of airport operators. Indeed, in 2009, ACI EUROPE launched [Airport Carbon Accreditation](#) – a voluntary carbon management programme, providing airports with a technical framework for their carbon management and recognising their efforts through independent certification. From an exploratory initiative that began with 17 of the environmentally most advanced airports in Europe in the first year, it has gone on to become the global industry standard with 274 accredited airports worldwide as of June 2019, welcoming close to 44% of global air passenger traffic. In the reporting year May 2017 – May 2018, the then accredited airports reduced the emissions under their direct control by 347,026 tonnes of CO<sub>2</sub>, or minus 5.3% compared to the baseline. *Airport Carbon Accreditation* has won praises from several authoritative institutions, including the United Nations Framework Convention on Climate Change (UNFCCC), the European Commission and EUROCONTROL.

At the same time, ACI EUROPE has actively supported the aviation industry in defining and pursuing its three climate goals as defined in 2007. In particular, ACI EUROPE welcomed the adoption of the Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) as a complementary mechanism to the other components of the ICAO Basket of Measures – technology improvements, new operational procedures and the deployment of sustainable aviation fuels (SAF).

However, ACI EUROPE considers that the scientific findings of the UN Intergovernmental Panel on Climate Change (IPCC) Special Report on Global Warming of 1.5° from October 2018 require a step change in climate action. That is why ACI EUROPE adopted [a new Resolution on climate change](#) on 26 June 2019, through which European airports:

- Call on all aviation industry stakeholders globally to complement the existing aviation climate goals with a joint vision and roadmap towards a net zero carbon emissions air transport system.
- Call on governments at ICAO to establish a work plan aimed at approving a long-term carbon emissions reduction target and related roadmap at the 2022 ICAO Assembly.
- Commit to net zero carbon emissions from airport operations fully within their own control by 2050 at the latest - without offsetting.
- Call on the EU and governments to accelerate, where necessary, a clean energy transition.

ACI EUROPE and its members stand ready to support the EU institutions in defining a policy framework incentivising the above. We believe that particular attention should be paid to the deployment of sustainable aviation fuels (SAF) as well as R&D in new aircraft propulsion systems (e.g. electric and hybrid). It is also important to accelerate efficiency improvements in the European Air Traffic Management system, as pursued in particular through the Single European Sky. Finally, consideration should be given to the environmentally most effective options for the future of EU Emission Trading System (EU ETS) for aviation in the context of the implementation of CORSIA in Europe.

# NOISE



According to the [European Environment Agency](#), 5.2 million people in Europe are exposed to excessive average noise levels (equal to or above Lden 55dB) from aircraft. In comparison, 18.8 million are exposed to such noise levels from rail traffic, and 104.8 million from road traffic.<sup>1</sup> Noise exposure can negatively affect health and well-being of citizens.

Aircraft noise is regulated at several policy levels, from global, through the International Civil Aviation Organization (ICAO), to local. Since 1972, ICAO has set standards for aircraft noise which are globally applicable, the last of which is ICAO Chapter 14. In the EU, aircraft noise is addressed by the [Environmental Noise Directive \(2002/49/EC\)](#), which requires Member States to regularly perform noise mapping around industrial areas and transport infrastructure, including airports, as well as to define noise action plans. [Regulation 598/2014](#), dedicated to aircraft noise, reinforces the implementation of the ICAO Balanced Approach, which was adopted by ICAO back in 2001 as an overarching framework defining the main pillars of aircraft noise management: noise reduction at source, land-use planning, noise abatement operational procedures and, as a last resort, operating restrictions. It requires the most suitable noise mitigation measures to be defined on an airport-by-airport basis, with engagement of all stakeholders concerned and in particular, local communities, supported by a cost-effectiveness analysis.

European airports are already implementing a wide array of actions to reduce or mitigate noise exposure. For example, 90% of airports (representing 60% of European air traffic) implement noise abatement operational procedures, while 79% have operating restrictions in place, [65% have noise insulation schemes for local communities](#).

This multi-level approach recognises the complex nature of noise and noise management. Thus, while it is relevant to regulate the noise performance of aircraft and define a general framework for noise management at the international level, decisions related to noise exposure at individual airports are best made locally. For instance, as outlined in the [ACI EUROPE Analysis Paper Addressing the Future of Aviation Noise](#), there are often trade-offs between noise concentration, which can reduce the number of people exposed but entail a relatively high exposure for them, and noise distribution – which can lower noise levels but increase the number of people exposed. Furthermore, there are interdependencies between noise and gaseous emissions: circumventing a densely populated area to reduce noise exposure might lead to longer routes and increase emissions. To tackle such trade-offs, the needs and preferences of local communities as well as the specifics of operations at the airport need to be taken into account. This is all the more important as it is increasingly acknowledged that non-acoustic factors (e.g. subjective perceptions and attitudes) significantly influence the level of annoyance experienced due to noise exposure.

ACI EUROPE considers that it is important for the ICAO Balanced Approach to remain the foundation of noise management in Europe. To enable airports to address noise annoyance in a comprehensive manner, it is also essential to better understand non-acoustic factors. It remains equally important to ensure continued R&D to promote further reduction of noise at source. Given the rapid developments underway in civil supersonic aircraft technology, it will be crucial to ensure that progress achieved so far in reducing the noise impacts of aviation is not put at risk.

# SUSTAINABILITY STRATEGY



In a fast-changing world marked by economic disruptions, resource depletion and new societal and political dynamics, airport operators have to put the social purpose of their business at the core of their activities – they have to implement a new Business-to-People paradigm in order to maximise the added value they provide to society. This is all the more important as airports act as an interface between various aviation and non-aviation stakeholders. Consequently, they have the opportunity to influence their behaviour and promote sustainability far beyond their operational remit, thus becoming role models.

To support its members in these efforts, ACI EUROPE launched a comprehensive [Sustainability Strategy for Airports](#) on 26 June 2019. It provides the first ever comprehensive industry-wide sustainability framework and guidance to airport operators, articulated around a shared vision of the sustainable airport of the future:

*Every airport builds local and global partnerships to accelerate the journey towards fair, prosperous and environmentally responsible societies.*

The strategy addresses the three dimensions of sustainability – environmental, social and economic, and focuses on areas where ACI EUROPE sees significant potential for airports to be more ambitious and step up their efforts, in particular by implementing voluntary measures beyond regulatory requirements. It covers a broad range of topics, from climate change, material resources and biodiversity to human rights and business ethics, noise and quality of life of local communities, employee experience, sustainable supply chain and sustainable destination (tourism), amongst others. For each of these topics, it outlines pathways with recommended actions that can help airport operators implement the above vision and defines indicative metrics to support them in measuring their achievements and identify areas for further progress. It also relates to the UN Sustainable Development Goals (SDGs) and the Global Reporting Initiative (GRI).

Looking at the airport industry from the broad perspective of sustainability reveals that there are numerous interdependencies between different impact areas of airports, implying possible trade-offs. For example, while traffic growth has positive impacts on the economic development of a region through job creation, it also entails negative environmental impacts and, in some cases, may support overtourism. To help its members address these and other interdependencies, ACI EUROPE's Sustainability Strategy for Airports recommends that airport operators include the assessment of their impacts on non-financial capital (e.g. natural, social, human) in their business strategy and performance management, thus striving to achieve a truly balanced business model.

Likewise, ACI EUROPE considers that a truly integrated, holistic policy-making, taking into account the above interdependencies and including extensive cost-benefit analysis, is required in order to achieve meaningful progress towards more sustainable aviation. This calls for stronger coordination between different DGs of the European Commission, European Parliament Committees and the various national authorities to enable interdisciplinary decision-making, covering the environmental, social and economic domain in a comprehensive manner.

# SECURITY & SAFETY



# AVIATION SECURITY: THREATS TO CIVIL AVIATION



## BACKGROUND

Aviation security arose as a serious issue in the late 1960s, when International Civil Aviation Organization (ICAO) assumed a leadership role in developing aviation security policies and measures at the international level. Up until the early 2000s civil aviation security was the sole remit of national authorities, but after the terrorist attacks on 11 September 2001 it was agreed that the European Union should set out common rules in the field of civil aviation security for the EU. The current framework legislation is [Regulation \(EC\) No 300/2008 of the European Parliament and of the Council of 11 March 2008](#).

As threats have evolved and new threats emerged, the Commission Implementing Regulation (currently [Commission Implementing Regulation \(EU\) 2015/1998 of 5 November 2015](#)) has been amended and updated several times.

## THE THREATS

There are multifarious threats to civil aviation, which are evaluated regularly by the ICAO Working Group on Threat and Risk and in the EU by the European Commission in collaboration with Member States. The European Commission with Member States regularly carries out Risk Assessments on the effectiveness of EU mitigation measures, and adjusts them where necessary. The threats to civil aviation have been identified as:

- Person-borne improvised explosive device (IED) on the body or in cabin baggage
- IED in cargo
- IED in hold baggage
- Conventional hi-jack
- IED in services (catering, in-flight supplies, etc.)
- Chemical, Biological, and Radiological threats
- Aircraft used as a weapon
- Cyber attacks
- Man-portable air-defense systems (MANPADS) in conflict or proliferation zones
- Attack using remotely piloted aircraft systems (RPAS)/drones (on aviation targets)
- Landside attacks
- Vehicle-borne IED

## WAY AHEAD

ACI EUROPE works with the European Commission to devise risk-based approaches to threats while balancing the need to improve security and at the same time enhancing the passenger experience.

The current Framework Regulation, largely, covers all the above threats. Where threats are not specifically covered they are dealt with under different mechanisms. For instance, landside security falls under work carried out by DG HOME as part of their Critical Infrastructure Protection work, while ACI EUROPE leads a Landside Security Operational Working Group, with national aviation and law authorities to develop best practice guidelines.

There are no current legislative initiatives requiring the involvement of the co-legislators.

# CYBERSECURITY AND AIRPORTS



Cybersecurity risks are a serious concern for the airport sector.

The [EU Network and Information Security \(NIS\) Directive](#) entered into force in May 2018. The Directive focused on essential services and digital services providers from key industrial sectors. The transport sector is one of them.

The European Commission tasked the European Union Aviation Safety Agency (EASA) to develop a roadmap to protect the aviation sector from cybersecurity threats to safety. At the same time the European Commission has set out proposals to introduce new legislative amendments to EU aviation security regulations.

Thus, airports find themselves at the crossroads of potentially multiple regulatory requirements with possible overlaps, all implemented with different timelines. The risk is that airports will be confronted with a lack of coordination between the various oversight authorities resulting in administrative and legal uncertainty. It is, therefore, important that:

- Any cybersecurity policy should be outcome-focused, giving agility between the different regulatory regimes, and give flexibility in terms of oversight and compliance for both Member States and industry. There should be oversight coordination between the different possible competent authorities. Measures implemented by an organisation to meet the legislative requirements of one functional area (such as security, safety or essential service continuity) should be deemed sufficient to meet the requirements of other obligations, provided that there are equivalent outcomes.
- The cyber assessment work should ensure an airport is compliant with ALL regulations regardless of what body they emanate from (e.g. ICAO, EU, EASA, national authorities).
- Any rule or regulation should be risk-based, meaning that small and medium size airports may be able (based on their risks and the impact on their operations) to have cybersecurity programmes commensurate with those risks.
- Criticality should not be unilaterally prescribed by authorities but defined in collaboration between the authority and the airport operators. Airport operators should be given the opportunity to demonstrate why such systems or services or cyber resources are not critical to their operations.
- Any rule or regulation should be based on an accepted industry standard for Information/Cybersecurity such as ISO 27001, EN16495, etc., which includes elements of the supply chain. This will ensure that suppliers of critical systems and infrastructure as well as cross-company, cross-sector, and cross-industry suppliers are considered and these bodies should be considered within the scope of any regulation.
- Airports should be deemed to comply if they are independently certified to the selected standard.

The current legislative initiatives will not require the involvement of the co-legislators, but it will be necessary for a coordinated European approach to be pursued and for regulators to maintain visibility of the multiple strands at play.

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# DRONES



Incidents at airports involving drones have been increasing in prominence in the past few years, with attention having been focused on the matter since London Gatwick was closed for two days in December 2018 due to a series of drone sightings that presented a clear threat to aviation safety. The Gatwick incident disrupted 1,000 flights and over 140,000 passengers, at one of the busiest travelling periods of the year, highlighting the importance for airports of preventing such occurrences.

In ACI EUROPE's [Position Paper on Drone Technology](#) of January 2018 we call for a European safety rulebook that would ensure effective regulation of drone operations at and around airports. It is imperative that airports be designated no-drone zones and that clarity be ensured over which technologies may be safely deployed at airports to detect unauthorised drones and prevent them from interfering with airport operations. Airports should develop Concepts of Operations and contingency plans for dealing with drone incidents, detailing procedures, lines of communication and responsibilities for drone-related incidents.

Clarity is also required as to which entities – airport operators, air navigation service providers, state authorities, etc. – are responsible for surveillance, detection and enforcement. For this, a common European approach is necessary in order to avoid a patchwork of national measures, while bearing in mind that some elements may be specific to the airport or country in question.

A registration scheme is required for drones and their owners/operators, with any subsequent drone operations at the airport then subject to authorisation based on clear rules and procedures for the chosen drone scenario (including risk assessment, the drone type being used and the pilot operating the drone).

[Regulations](#) have already been adopted setting out requirements for a range of drone operations, depending on the drone being used, its purpose, the relevant airspace and the outcome of the mandatory risk assessment. This represents a good basis for ensuring that authorised drone operations are safe and properly managed.

Further regulations and initiatives are planned with regard to the most stringent “certified” category of unmanned aircraft, as well as for the development of U-Space traffic management services and defining the geographical zones where drones may and may not go.

Not all initiatives will require the involvement of the co-legislators, but it will be necessary for a coordinated European approach to be pursued and for regulators to maintain visibility of the multiple strands at play.

Many aspects involved in protecting airports from drone incursion are best dealt with at a local level, but it is vital that the numerous initiatives being carried out by the European Commission, the European Union Aviation Safety Agency (EASA), EUROCONTROL, the SESAR Joint Undertaking and national authorities create neither duplicating nor misaligned regulatory requirements.

**2.34** billion passengers (2018)

**+46%** airport connectivity (2019 vs 2009)

**+10%** direct air connectivity = **+0.5%** GDP

**98%** of Europe's airports offer rebates/incentives to airlines

**€12.2bn** uncovered cost from airport charges paid by airlines

**44** carbon neutral airports in Europe in 2019\*

**-163,277** tonnes of CO<sub>2</sub> reduced by Europe's airports (2017-2018)

*\*For latest updates visit [www.airportCO2.org](http://www.airportCO2.org)*

ACI EUROPE is the European region of Airports Council International (ACI), the only worldwide professional association of airport operators. ACI EUROPE represents **500 airports** in 45 European countries. Our members facilitate over 90% of commercial air traffic in Europe: **2.3 billion passengers, 21.2 million tonnes of freight** and **25.7 million aircraft movements** in 2018.

In response to the Climate Emergency, in June 2019 our members committed to achieve **Net Zero** carbon emissions for operations under their control **by 2050**, without offsetting.

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