IATA’s position on the European Commission proposal for a SES 2+

Executive summary

A welcomed update…

- We welcome the proposed update on the Single European Sky (SES).
- The completion of the SES will finally create the opportunity to reform ANSPs and deliver improvements to the environment, generate more jobs and prosperity, and reduce delays for consumers.

National Supervisory Authorities (NSA)

- The establishment of an independent European economic regulator for air navigation charges to define the targets to be achieved, oversee progress and determine binding financial corrective action is fundamental to the success of SES.
- We therefore strongly support the creation of truly independent economic regulator for ANS. The same rationale is valid at national level.

Service provision

- We welcome the requirement of an economic certificate for air navigation services conditioned upon the fulfilment of certain requirements regarding financial robustness, liability and insurance cover.
- That said, we seek further clarification to understand how the rules for financial robustness can and will be developed.

Common information services for unmanned aircraft (i.e. drones)

- We welcome a safe inclusion of drones in the airspace.
- IATA strongly believe that robust safeguards against the creation new monopoly data provider or provider with a dominant position should be foreseen.

Performance targets & Charging

- We welcome the exclusion of safety as a performance target. Safety is a prerequisite and not a target.
- We support binding performance obligations and ask for a proper implementation.

Modulation of Charges (SAF) & Common Unit Rate

- The proposal by the EC to modulate charges is not supported.
- Modulating ANSP charges in relation to CO2 emissions or the use of SAF may provide a perverse incentive for aircraft operators to fly longer routings in order to avoid more costly charging schemes.
- Congestion and peak charges with different charges during particular periods have very little impact or influence on traffic patterns and especially within relatively dense and complex airspace such as core Europe.

EASA / Performance Review Body

- We welcome the reinforcement of the role of PRB (with EASA) and the guarantees of its independence.
• Airspace users need to have the guarantees that the PRB should/will not report to the EASA management board.
• In addition, and to avoid any conflict of interest, the PRB shall not receive orders from the EASA management board and be fully independent

Strengthening the power of the Network Manager
• IATA considers that the NM should be empowered to plan and coordinate the European ATM system.
• However, the impact on individual airline planning and operation within this framework must be clarified.

Airspace interoperability and technological innovation
• IATA fully support the and welcome the inclusion of FUA, SESAR Coordination and Common Projects within the regulatory framework.
• IATA welcomes the initiative of the Commission to establish a European Partnership for Air Traffic Management under the umbrella of Horizon Europe. We believe that the work done by the SESAR Joint Undertaking (SJU) needs to be continued as the future research and innovation programme for ATM will still require a close coordination.

ATCO training and licensing:
• The airspace user community need to be included in this initiative to define and implement modern techniques, such as system-based training and qualification, as much experience can be derived from modern Airline training.