

SUSTAINABILITY

There is a compelling urgency in communicating the industry's efforts on environmental issues and sustainable aviation to the wider public, due to increasing social pressures and the announcements by some EU governments of their intentions to impose further taxes on aviation. In response, ERA is ensuring sustainability has a place at the top of its work priorities for its members. We have a strong lobbying and communications action plan agreed with the ERA Board and the Industry Affairs Group, which includes ERA specific actions as well as co-ordination with other industry stakeholders. As one of the first steps, together with ACI Europe, ERA sent a letter to all EU28 ministers responsible for taxation and environment, stressing that the industry is engaging on climate action and that regional communities across Europe depend on air travel.



AIRPORT CHARGES

As announced in the Aviation Strategy, the Commission launched the evaluation of the Airport Charges Directive 2009/12/EC in autumn 2016. Since then, stakeholders have been involved at various levels and at workshops, consultations and high-level events. ERA, alongside other airline associations, has presented the views of the air carrier community at all possible opportunities, stating that the directive should be revised to introduce stronger rules on consultation, a transparent charging system, independent oversight and a mechanism to identify and regulate airports with significant market power. In its own evaluation, of the directive published in mid-July, the Commission found shortcomings in several areas and concluded that the current framework needs to be reformed; proving our lobbying activity to be successful.



ERA AIR SAFETY GROUP

Throughout the course of the year, the ERA Air Safety Group has continued to focus on its 'Top 5' safety priorities agreed by ERA member safety representatives, with each group meeting addressing at least one of these issues. The top five priorities for 2019-20 are: RPAS, approach and landing threats, ground handling – pushback/chocking procedures, pilot and ATC communication and safety culture. Additionally and on behalf of the group, ERA was actively involved in various EU safety consultations and initiatives, including the following:

REMOTELY PILOTED AIRCRAFT SYSTEMS (RPAS)

The continued concern regarding the safety and security implications of inappropriate RPAS use, coupled with

the events at London Gatwick Airport during December 2018, are reflected in the fact the Air Safety Group again included RPAS in its top five priorities. With airports being a vulnerable target for malicious RPAS usage, especially in the approach/landing and departure phases of flight, the Air Safety Group fully supports the installation of counter measures at regional and major airports. At a group meeting in 2018, details were shared of trials of such equipment that were held at a member airport. ERA fully supports the EASA mandate on RPAS, which aims to enforce tighter regulation for the use of drones, both for public and commercial use. To share the concerns of our members, ERA participated on a panel of experts at the Countering Drones Global Conference held in London in July.

REGULATION EU261/2004

Discussion amongst the safety community identified that regulation EU261 has somewhat changed flight crew behaviour, with the realisation that a lengthy delay can result in a large financial penalty and consequently affect decision-making. As a result, some actions and judgements are not compatible with expected safety standards. The regulation in its current form is negatively influencing people making safety-related decisions. Risk taking, to avoid delay or cancellation compensation, is worryingly becoming less infrequent. Following the decision by the ERA Industry Affairs Group to prepare a paper on the huge costs to airlines of compensation payment to passengers, the Air Safety Group was asked to provide input on the flight safety aspects. As a result, examples were provided by several ERA members that demonstrated people will continue to take risks (knowingly or unknowingly), even if airlines take action to try to prevent such behaviour.

UNRULY PASSENGERS

An EASA initiative on unruly passengers, supported by ERA, focussed on levels of behaviour deemed unacceptable prior to boarding and on board an aircraft. Many ERA members operate single cabin crew aircraft, so the problem of dealing with unruly passengers is somewhat magnified, placing an almost impossible burden on the cabin crew. The EASA initiative includes a passenger education video that was designed to be exhibited at airports and/or included as part of an operator's pre-flight safety demonstration. ERA used this campaign as an opportunity to reinforce the concerns of our members and highlight how vulnerable smaller/regional aircraft are in the event of an unruly passenger situation.

CYBER SECURITY – EUROPEAN STRATEGIC CO-ORDINATION PLATFORM (ESCP)

During 2018–19 the ESCP initiative has co-ordinated the definition and implementation of the European Strategy for Cyber Security in Aviation. Stakeholders at each meeting were provided with an opportunity to contribute towards developing the strategy, decide on the structure of the ESCP and endorse the future work programme. The goal will be the publication of a charter document, which although not legally binding, will act as a political statement on what the industry in the EU must do to combat the evolving cyber threat. To support the work already done by the ESCP, a high-level conference was held in Toulouse during November 2018. The threat of cyber is not restricted to the aviation industry. An inaugural transport cyber event involving representatives from aviation, maritime and rail was held in January 2019, where all three industries had the opportunity to understand one another's cyber vulnerabilities and brainstorm future safeguarding initiatives.

CO-OPERATION AGREEMENT WITH THE FLIGHT SAFETY FOUNDATION (FSF)

Since 2013, ERA along with Eurocontrol and the Flight Safety Foundation (FSF) have collaborated on jointly hosting the annual Safety Forum. The purpose of each forum is to focus on a specific safety issue that representatives from across the industry, including airlines, airports, ANSPs and regulators can openly discuss and agree findings, strategies and action opportunities. The topic for this year's forum was 'safety and procedures' which targeted operational and safety professionals, focussing on safety and procedural aspects within the industry. To recognise the collective action of both ERA and the FSF regarding both the safety forum and other common safety challenges, an agreement was reached to create a closer working relationship by means of a co-operation agreement that was jointly signed in September 2019.



ERA GROUPS

Working with our members, helping to shape our industry's future



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ERA GROUPS – WORKING COLLECTIVELY WITH OUR MEMBERS

TAKING POLICY MAKING TO THE NEXT LEVEL

The power of one collective voice, representing multiple companies and businesses, to promote and protect one industry sector is incredibly strong. ERA's ethos is to do just that, and its regular groups contribute hugely to our industry's successes, in helping to grow and expand the future dynamics of the business and in providing a learning environment for our members.

ERA groups have a simple concept; they are created for the members and the success of the groups is driven by the members.

ERA's groups provide our members with:

- the chance to influence and steer policy and technical activities with regulators and industry stakeholders;
- an ability to exchange views and experiences with other industry colleagues and specialists;
- excellent networking opportunities with fellow members;
- a forum to meet with ERA's dedicated policy and technical team of experts; and
- the power to learn and expand their industry knowledge.



ERA OPERATIONS GROUP

SPI REGULATION – ADS-B RETROFIT

The ERA Operations Group has devoted considerable time over the past 12 months to working with the European Commission, EASA and other stakeholders to seek practical, proportionate mitigating measures toward the implementation of EU Regulation 1207/2011 and subsequent amendments concerning enhanced airborne surveillance, and specifically ADS-B retrofit requirements for member airlines by 7 June 2020.

The requirement to retrofit some types would be burdensome for some regional airlines, where retrofitting ADS-B equipment can be disproportionately expensive, and in any event, some of these aircraft are planned for retirement soon after the implementation deadline.



The Operations Group co-ordinated an ADS-B compliance survey on behalf of the SESAR Deployment Manager (SDM). This survey showed that of the 289 regional aircraft captured, only 43 (15 per cent) were equipped and that less than 20 per cent of civil airspace users who responded to the SDM survey have equipped with ADS-B so far. Despite the apparent low numbers however, it appears that many ERA members will meet the compliance date next year but there remains a significant number of aircraft for which retrofit will not be possible in time.

Through the consolidated work of ERA's Operations Group and collaborative efforts with other industry stakeholders, the Commission has accepted that although the mandate must remain, reasonably justified exemptions, judged on a case-by-case basis, may now be considered. The Commission is currently working on an amendment of the Regulation mentioned above in order to clarify the exemption criteria as well as the process to apply for an exemption. This amendment will be adopted in the coming months.

The SESAR Deployment Manager, tasked with the function of managing the implementation, along with ERA's Operations Group, will work closely with members to assist both compliance and exemptions as required.

NETWORK MANAGER MITIGATIONS AND MEASURES 2019

Airlines in Europe suffered greater delays than ever before during summer 2018 due to network capacity constraints, and predictions for summer 2019 worse unless some mitigations were agreed before summer schedules began. ERA contributed to a series of meetings held in early 2019 at the Eurocontrol headquarters in Brussels. The objective of these meetings was to have a fully agreed set of measures in place to help mitigate, to the largest possible extent, the capacity shortfalls expected in some parts of the network. Approximately 250 measures were discussed as part of the proposals for summer 2019 affecting mainly Belgium, Germany, France, Spain, Italy, central and south-eastern Europe ACCs. ERA Operations Group members provided useful background information to help guide the measures to provide an acceptable outcome.

INDUSTRY SKILLS SHORTAGE AND RETIREMENT AGE

Shortage of qualified experienced and entry-level aircrew, as well as engineering personnel continues to impact the



industry. As ERA members are increasingly affected, the Operations Group has invested considerable resources to identify and establish initiatives and projects in the interest of promoting regional aviation as a long-term, sustainable and rewarding career path for all disciplines, genders and experience levels. The Operations Group has also been involved with EASA and local national authorities to explore the possibility of extending the retirement age for commercial multi-crew and for specific single-pilot commercial operations, including assessing the risk posed by multi-crew pilots flying beyond 60 years old and restricted by an Operational Multi-pilot Limitation. Through a risk-based approach, in co-operation with the agency and specialist human performance-related organisations, this work will continue throughout 2020 with support from our member airlines.

ACNUSA FINES

A number of ERA member airlines have received significant fines from the French Autorité de Contrôle des Nuisances Aéroporutaires (ACNUSA) following environmental infringements operating at French airports. Although, not limited to a certain type, these infringements tend to affect operators of aircraft with older, less sophisticated Flight Management Systems (FMS). Individual flights have been found to have strayed outside of a narrow environmental corridor, incurring a penalty of tens of thousands of euros per event, which the airlines rightly seek to challenge for a number of reasons. One example is the Standard Departure Procedure (SID) for Paris Orly, which is designed in accordance with, and certified as an RNAV one procedure. Aircraft flying this procedure must also be certified accordingly, which requires an accuracy of +/- 1NM to be flown up to 95 per cent of the time. This is an EASA certification standard, yet the environmental corridor for this departure is less than one NM either side of the departure

centreline and in places only a few hundred metres. This apparent anomaly is compounded by the initial track after take-off prescribed effectively as a runway heading to a turning point, which is defined as an intersection of two traditional navigation aids instead of an RNAV 'fix' defined

ERA INDUSTRY AFFAIRS GROUP

During the last 12 months, the ERA Industry Affairs Group has reviewed the top priority policy and regulatory matters affecting ERA members, and actions that need to be taken by the association to protect members' interests regarding these priorities. The priorities are: Brexit, EU261, PSOs, CORSIA vs EU ETS and airport charges/slots. Other issues discussed at this year's group meetings include airline ticket distribution, collective redress, API and PNR collection and sustainability. Based on the group discussions, ERA has issued a number of publications and letters to regulators with the objective of lobbying our members' position on important regulatory matters – either alone or as a joint initiative with other industry associations. The aim is to educate regulators and the general public of potential positive or negative consequences to changes in existing regulations, providing guidance to members following the implementation of any new regulations and providing the tools to join forces in lobbying campaigns.

REVISION OF EU261 AND ERA STUDY

ERA has actively contributed and provided various positions since the revision of Regulation EU261/2004 on passenger rights was tabled in 2013. ERA has responded to the Commission's consultations, together with individual airlines, and participated in all related bilateral meetings with consumer associations as well as multi-stakeholder workshops in 2019, to ensure the views of the smaller and medium-sized airlines are heard, as the impact of the regulation on them is huge. In parallel, the association has also published its own study on EU261. We are looking forward to more active discussions with the Commission and the rest of stakeholders in autumn 2019 with the aim of finally reviewing the regulation.

AIR TICKET DISTRIBUTION

Based on discussions at the Industry Affairs Group meeting in February, ERA started to examine the issue of distribution practices of certain legacy carriers where they hold a dominant position in the market. Certain airlines are currently facing serious challenges competing to distribute their tickets in the European Union via a vis large airline groups. As the Commission

is evaluating Regulation 80/2009 on the Code of Conduct for Computerised Reservation Systems (CRSSs), there is an opportunity to lobby for fair competition and so that consumer choice continues to be protected in the airline ticket distribution marketplace. ERA's position in favour of a CRS regulation that needs to be updated to reflect the new ticket distribution competition scenario, was formulated during a workshop the association held in May, then further communicated at the Florence seminar held by the Commission. ERA fully supports the principles around which the airline ticket distribution market has grown: a level playing field, fair competition and transparency. These principles were laid down in a position paper published in September.

BREXIT

After issuing a publication on Brexit in 2018, providing analysis on the potential impact on ERA member airlines post Brexit, ERA has been seeking clarification regarding some provisions (such as ownership and control rights, traffic rights and validity) of the contingency regulation should the UK exit the EU without a deal. ERA's position on Brexit remains unchanged and we are joining forces with other associations to call on UK and EU negotiators to seek future agreements that mirror today's arrangements as closely as possible.

