

European Commission
DG Energy and Transport
TEN-T
Brussels
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RESPONSE TO CONSULTATION ON TEN-T POLICY REVIEW GREEN PAPER

ERA, the European Regions Airline Association, represents some 60 European airlines primarily providing regular commercial intra-European air transport services, and carrying more than 70 million passengers on more than 1.7 million flights per year.

The ERA Directorate welcomes the opportunity to respond to the European Commission's consultation on its Green Paper on the TEN-T policy review.

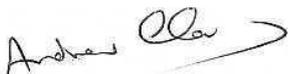
ERA's principle position is to support the response submitted by the Industry Consultation Body (ICB) on behalf of the Air Traffic Management (ATM) industry. ERA is a member of the ICB and wishes to endorse the response from ICB as also representing the views of the operators of intra-European transport represented by ERA.

In particular, ERA wishes to stress

- the value to the European Union provided by intra-European air transport, in particular economic benefits and social cohesion for the regions of Europe;
- the continuing need for air transport to Europe's regions despite the development of high-speed rail services, as air transport can reach greater distances and serve thinner markets significantly more efficiently (in terms of time, flexibility, cost and environmental impact) than high speed rail;
- the need for large investment in ATM infrastructure, including equipment on-board aircraft, to improve the efficiency and sustainability of intra-European air transport;
- the fact that some of this investment will naturally fall on commercial entities and member states that will themselves accrue less value than the costs that they are required to incur, while the overall benefits to the European Union as a whole justify the overall investment;
- the fact that while hitherto air transport has generally covered its infrastructure costs, this planned major redevelopment of the ATM infrastructure will not be comprehensively completed without external financial funding;
- the consequential need for rebalancing of TEN-T funding to take a greater account of the future needs of air transport.

I confirm that this contribution may be published by the European Commission.

Best regards



Andrew Clarke
Adviser Air Transport Policy