

A Roadmap for European Business Aviation

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What is business aviation?

We fly where others don't

Business aviation is a specialized travel solution and investment strategy, enabling people to meet face-to-face when time matters most. It allows users to have full control over their schedule and travel to at least three times more destinations in Europe than airlines – many of which are not served by other forms of air travel. This leads to productivity gains, whilst also connecting communities in remote places, boosting their economic growth in the process.

The European Business aviation sector

A symbol of European excellence, Business aviation is a dynamic sector which fosters technical innovation and environmental stewardship across the full value chain, from manufacturers to operators. It provides highly skilled jobs and increases economic growth both within the industry and the local communities around the airports.

Why does Europe need Business Aviation? What is its value?

Business aviation brings value to European companies, citizens and communities both as a specialised, secure, time-efficient mode of travel and as a dynamic sector providing highly-skilled jobs.

European Competitiveness

Business aviation is a leading contributor to the European job market, securing nearly half a million highly skilled, highly paid jobs and accounting for almost 87 billion Euros of added-value to European GDP.

Environmental stewardship

Business aviation fosters environmental stewardship across the full value chain and is gearing up to meet its carbon neutral growth targets by 2020.

Connectivity

Business aviation seamlessly connects distant and remote regions, spurring investment and the growth of business and communities in these regions.

Productivity gains

Business aviation enables more efficient and productive face-to-face inter-actions when time matters the most.

Safe and Secure

Safety and security are top priorities for the Business aviation sector, which has adopted ambitious voluntary measures to ensure that airports, aeroplanes, pilots and passengers are safe and secure.

Facts and Figures about European Business aviation

- Commitment to:
 - a **50%** reduction in total CO2 emissions by 2050
 - **2%** improvement in fuel efficiency per year between 2010 until 2020
 - Carbon-neutral growth by **2020**
- **8%** of the European traffic
- **374,000** direct and indirect jobs
- **87 billion** euros economic output
- Based fleet: **3,700** aircraft
- Business aviation connects over **120,000** unique European city pairs a year
- **1,400** European Airports connected (among which 900 by Business aviation only)
- **2,000 flights every day**, among which 90% are within Europe
- Average time saved per trip: **127** minutes
- **70** medical flights per day

Three priorities to enable improved connectivity, efficiency, European competitiveness and regional cohesion across the continent.

To continue our economic and connectivity contribution to businesses and citizens in Europe and to respond to future generations' expectations, we need;

1. Improved Access to Airports and Airspace

Airline traffic is growing, and Business aviation is the last in a long queue. The estimated doubling of overall air travel by 2035 will even further lead to capacity constraints which need to be addressed now.

2. Fair and Proportionate Regulation

One size does not fit all. Our operations and our operators have their own specificities and safety concerns that need to be taken into consideration by legislators. For example, many EBAA members are SMEs and family-owned businesses.

3. Promotion of continuous improvements on Sustainability and reducing our environmental impact

EBAA supports our members in getting ready for CORSIA and actively promotes our sector's carbon neutral growth targets by 2020. EBAA also promotes the development and adoption of Sustainable Alternative Jet Fuel (SAJF), and introduced the "Business aviation Guide to the Use of Sustainable Alternative Fuel (SAJF)," focused on raising awareness and adoption of available and sustainable alternative

jet-fuel options. Demonstration of how sustainability improvements Business aviation can support the UN's 17 Sustainable Development Goals.

ENVIRONMENT

We foster environmental stewardship across the full value-chain and is gearing up to meet its carbon neutral growth targets by 2020.

Business aviation published the Business aviation Commitment on Climate Change in 2009, supported by the entire industry. This commitment is the foundation for everything that we do towards reducing our impact on the climate and the environment. It sets aspirational goals and a pathway to achieving those goals at milestone points out to 2050.

The goals are:

1. Improving fuel efficiency 2% per year from 2010 until 2020
2. Achieving carbon-neutral growth from 2020
3. Halving total CO₂ emissions by 2050 relative to 2005

Pathways:

1. Investment in new aircraft technology that includes sustainable aviation jet fuel (SAJF)
2. Flying using more efficient operations
3. Building and using an efficient infrastructure
4. The use of effective global market-based measures

CORSIA

The Carbon Offsetting and Reduction Scheme for International Aviation (CORSIA) is a milestone mechanism within international aviation for reducing the climate impact of the industry and supports the goal of carbon-neutral growth.

What is important to our sector?

→ That there is one type of carbon reduction market-based scheme globally to assist operators their impact rather than an individual a patchwork of schemes that small operators may find difficult to manage.

→ That any market-based mechanism includes support and incentivises the use of sustainable aviation fuel.

→ Alignment of rules and exemptions in market-based measure schemes - CORSIA and the EU ETS.

→ Fair and equitable treatment of Business aviation within market-based measures and carbon reduction schemes.

Sustainable Alternative Jet Fuel (SAJF)

Business aviation's activity in SAJF took a significant step forward with the publication of the SAJF Guide and associated demonstration events with momentum and education on the subject building. SAJF is the biggest opportunity for our sector to achieve its climate goals.

What support does our sector need to improve the uptake of SAJF?

- Policy mechanisms towards enabling and supporting the development of local infrastructure to produce the fuels required by the industry.
- Continuity between the European Union's RED II and CORSIA in terms of carbon accounting rules and mechanisms.
- Clarity on sustainability requirements for the feedstock, production and use of SAJF
- Help to make the SAJF market investable and enable long term purchase agreements possible to stabilise and finance the fuel.
- Further pathways for feedstock development and subsequent certification of those pathways.

Noise

Noise continues to be an area where aircraft manufacturers put considerable design time and investments towards reducing aircraft related noise.

What is important to our sector?

- Continue to improve the mechanisms within the "balanced approach" basket of measures to noise in order to minimise local noise at airports.
- Continued support through research funding to reduce aircraft and airframe noise.
- Continued support for noise-reducing operational procedures like Constant Descent Approaches (CDA).
- Any noise improvements should not lead to a trade-off that would increase overall CO2 emissions.

We also call for equal treatment and no unilateral rulemaking for supersonic noise and emissions.

Taxes

Taxes levied specifically on aviation fuel would harm business aviation's socio-economic contribution, connectivity and are an ineffective way to pursue environmental goals.

In addition, numerous EU-wide taxes already affect business aviation. On top of those existing taxes, European Member States impose taxes at national level, such as the British Air Passenger Duty (APD) or the Italy's luxury tax.

What is important to our sector?

→ We urge European and national policy makers to focus on concrete actions that support the growth of our sector, and our members' sustainability efforts, such as; concrete support (such as tax incentives) in the delivery of SAJF; funding and development capability for future hybrid and electric aircraft systems; or the full implementation of the SES that would allow our operators to reduce their fuel consumption by 5 to 10%, as well as related CO2 emissions.

SAFETY

Safety comes first for all aviation. EBAA promotes the use of best practices and compliance with industry standards such as IS-BAO. We also support individual approaches to reduce risk and implement initiatives to improve safety.

Aviation regulation already provides a baseline for aviation safety and it needs to be proportionate to achieve the desired outcomes. Today, regulation covering commercial operations is very much tailored around scheduled traffic, operating large fleets of same aircraft types from a hub to normally well-equipped airports and back. From a regulatory and safety perspective this creates undesired side effects of over complication potentially affecting safety for smaller operators with on demand operations, to and from secondary airports with irregular intervals and small multi aircraft type fleets.

FTL requirements for air taxi and single-pilot operations

Business aviation on demand, non-scheduled operations are subject to an FTL rule defined in accordance with scheduled airline type of operations constraints.

→ Business aviation calls for a full specific set of FTL rules defined in accordance with the realities and the specificities to avoid fatigue-inducing rostering or unwarranted restrictions on crew duty caused by the differences between scheduled and on demand traffic patterns.

Recognition of industry standards

The Business aviation community's commitment to keeping a continued focus on safety takes many forms. These include the implementation of the two IBAC standards: International Standard for Business Aircraft Operations, IS-BAO, and International Standard for Business aviation Handlers, IS-BAH, both being a blueprint for making safety a part of the entire culture for a flight operation.

Both IS-BAO and IS-BAH are the only aviation industry code-of-practice recognized by ICAO and by EASA for meeting its Safety Management System requirements, and CEN the European Committee, for standardization.

Nevertheless, there is still work being done by the Business aviation community, in partnership with EASA for both these standards to be accepted as the default standard of safety compliance for Business aviation operators and handlers.

→ While we appreciate all the work being done, we want to underline the importance of this work being continued and finalized with the recognition of IS-BAO and IS-BAH as the default safety standards in business aviation.

Definition of Business aviation in the context of the EASA Basic Regulation

Regulations covering commercial operations are mostly written to cover scheduled airline operations. Most of the commercial, on-demand Business aviation operates under the same regulation as scheduled airline traffic, large fleets of same aircraft types and operations beginning at a hub or an operational base to normally well-equipped airports and back.

→ Properly defining Business aviation in aviation regulation would assist in having a proportionate regulation that properly addresses safety issues that concerns Business aviation without over regulating the Business aviation sector and thereby creating a temptation to operate under a simpler set of rules.

→ Proportionate regulation shaped with the aid of a Business aviation definition would assist in removing the temptation to operate, from a regulatory perspective, on the border between commercial and general aviation which might create a safety concern.

Access to major airports: safety perspective

Access to the entire network of airports of all sizes is part of what makes the Business aviation model thrive - to bring the customers as close as possible to the intended destination.

Over 2 travel hours (127 minutes) are saved on average – not being able to achieve / enhance this saving would eliminate our sector's key competitive advantage.

Nevertheless, our operations are not limited to business passengers only. More than 70 Business aviation medical flights per day depend on access to the entire network of airports. The Business aviation community prides itself with these medical flights (passengers, supplies/equipment, blood and organs), out of which 80% are life-saving.

Being diverted for capacity reasons to airports in the vicinity of the original destination might increase the need for fuel stops. More operations means more time spent within flight duty and potentially inducing crew fatigue, as well as affecting airspace capacity by unnecessarily bringing movements to maximum safe limits.

Restricting business aviation's access to major airports has other safety implications, as well - landing at secondary airports sometimes translates into operational challenges with smaller safety margins.

Though we appreciate that airports and airspace capacity are saturated, pushing Business aviation flights out of major airports is not a satisfactory solution. The way it stands, Business aviation flights – including the above-mentioned medical flights – are generally at the bottom of the list when it comes to slot allocations.

→ We call for your support in reviewing the slot allocation regulation, as it does not reflect the operational reality.

Airports

Business aviation operators face serious challenges regarding the ability to access a growing number of key airports in Europe. Continued access is threatened by the growth of scheduled carriers, benefiting from automatic preferential rights.

→ EBAA calls for regulation that allows Business aviation to access the same level as scheduled operators through appropriate slots regulation.

Slots

Business aviation cannot adapt to the current mechanism of slot acquisition, nor can it fit the definition of 'programmed non-scheduled'. It risks therefore being marginalised, if not effectively banned in the near future from operating at these airports.

The continuous growth in air transport has increased pressure on the capacity available for aircraft movements at certain airports where demand for take-off and landing slots exceeds infrastructures' often scarce capacity.

However, owing to the specific nature of Business aviation and other non-scheduled operations, the current slot regulation cannot adequately address the sector's slot allocation need. As it is, the proposed revision prevents Business aviation operators to obtain and maintain access at any airports that would become coordinated.

→ EBAA calls for a fair and equitable solution recognizing historical rights for all airspace users, with an understanding that each model is an essential component of Europe's air transport policy.

Security

Today, Business aviation passengers are mostly funnelled through the same, one-size fits all, security checks; it devalues regulation on derogations from common security standards for non-scheduled operators and of the principle of risk-based measures.

→ EBAA calls on the European Commission and the Member States to adapt security measures to better fit with operations and specificities.

Airspace

Access to airspace and airports remains a key priority. Business aviation needs a proper plan to defragment the European ATM system. It requires a clear Single European Sky vision, including;

- A governance defining the roles and responsibilities of the various institutions. The European Commission must take the lead of this strategic task.
- Chapters for each major SES component (for example, the CNS vision).
- The Single European Sky needs to be inclusive and fit the operational needs of all airspace users, small and large ones, as well as civil and military ones.
- It should be built on what exists today /on the existing aircraft capabilities. There is no need for new airborne mandate. The European mandates should be set up in a way to ease airspace users' planning for equipment and investments in technology.
- Public funding must be managed efficiently and allocated to off-set air navigation charges;
- The Network Manager should be the leader for network performance information and should be engaged more actively in a managerial role to support and facilitate EU-wide decisions in the interests of the network. The Network Manager must be given the legal mandate to properly manage the ANSP's. This will optimise performance and help achieve the 'benefit for all' approach.

Business aviation aircraft are able to operate from small runways or hubs, can fly at low as well as high altitudes up to FL510. Business aircraft operate worldwide, in all classes of airspace (controlled and uncontrolled), in combination with all types of traffic (commercial aviation, state aircraft, and light aviation). Business aviation acts as a real spur for innovation in ATM. It will therefore be a major contributor to the change and can be among the early movers.

→ This requires the proper tools to make it happen, including access to a fair incentive scheme.

Business aviation operators are primarily Small and Medium-sized Enterprises (SMEs), and just as SMEs in any other sector, face significant difficulty in accessing the necessary finance to ensure continued growth.

→ The European Union should simplify the application process for SMEs to future calls for proposals and EU funding grants in the area of investment, research and innovation. This can be done through; rebates, differentiated charging scheme and easing EU-funding allocation.

Contact EBAA

We look forward to supporting the European Commission and any policy-makers to draft inclusive policies and regulations taking into account the specificities of the Business aviation operations.