



Fédération
Nationale de l'Aviation
et de ses Métiers



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**-Air Transport in the context of the
renewal of the European
institutions
17 FNAM proposals**



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FNAM represents 95 % of Air Transport activity

It federates trades through 7 professional groups:

airlines (Air France, Hop !, Transavia, Chalcir, French Bee, Dassault Falcon Service, Air Caraïbes Atlantique, AirCalin, Pan Européenne Air Service, Airbus Transport International, APG Airlines, La Compagnie and Corsair), ground handling services (Groupe Europe Handling, Groupe 3S Alyzia, etc.)

freight transport, business aviation, aircraft maintenance and airport services, helicopter transport, general aviation, aeronautical training and airports.

~ 85 000 employees

- 19%

Passenger traffic in France in 2022
compared with 2019

145

million passengers in
France in 2022

370 adhering
members

1 006 apprentices
trained in 2022

**French air transport :
a key sector for the French
Economy**



A significant actor of World Air Transport

A major hub in Europe

An important airport network in France, tool for opening up French regions

A performing connectivity for French Regions with the world

A sector vital to France's attractiveness as a tourist destination

A key factor in the choice of business location

FNAM's Membership

csta
Chambre Syndicale
du Transport Aérien

csae
CHAMBRE SYNDICALE DE L'ASSISTANCE EN ESCALE

EBAA
FRANCE

GIPAG
FRANCE

GPMA

Groupement des Professionnels
des Métiers de l'Aérien

SNEH
Syndicat National des Exploitants
d'Helicoptères

**UAF
& FA**
UNION
DES AÉROPORTS
FRANÇAIS
& FRANCOPHONES
ASSOCIÉS

Over the last thirty years, the European Union has contributed to the widespread development of air transport, which in turn has led to greater European cohesion by facilitating travel for the citizens of the 27 Member States. Air transport has always been able to innovate, transform, adapt and recover from numerous crises. This ability to adapt has led to the steady democratization of this means of transport, which is now used regularly by one out of three French people thanks to a steady fall in ticket prices. However, this boom in air transport in Europe cannot be sustained without considering the need for growth that is both sustainable and equitable.

In 2023, the French airline industry published its roadmap for ecological transition. The objectives of decarbonizing the aviation sector will be achieved by renewing fleets with more fuel-efficient aircraft, optimizing flight and ground operations, massively incorporating sustainable aviation fuels (SAF), and introducing new technologies, including potentially the first hydrogen-powered aircraft.

This roadmap is ambitious but realistic. Thanks to the research efforts and technological developments envisaged and depending on the availability of sustainable aviation fuels in the coming years, it will make it possible to eliminate between 80 and 90% of the direct CO2 emissions from French air transport by 2050.

But make no mistake, the ecological transition of the aviation sector will be very costly. Several billion euros a year will be needed to invest in research, acquire new aircraft, adapt airport infrastructures and modernize air navigation systems, incorporate DACs, and so on.

We are ready for this, and we are counting essentially on the sector's own financing capacity to achieve it. However, air transport will need to be supported in its transition by the European institutions, which will have to ensure that European airlines have an appropriate regulatory environment that preserves their competitiveness and guarantees fair competition with airlines from third countries. For us, this is what is at stake in the next European mandate in the aviation sector.

The FNAM's main proposals are set out in this document.

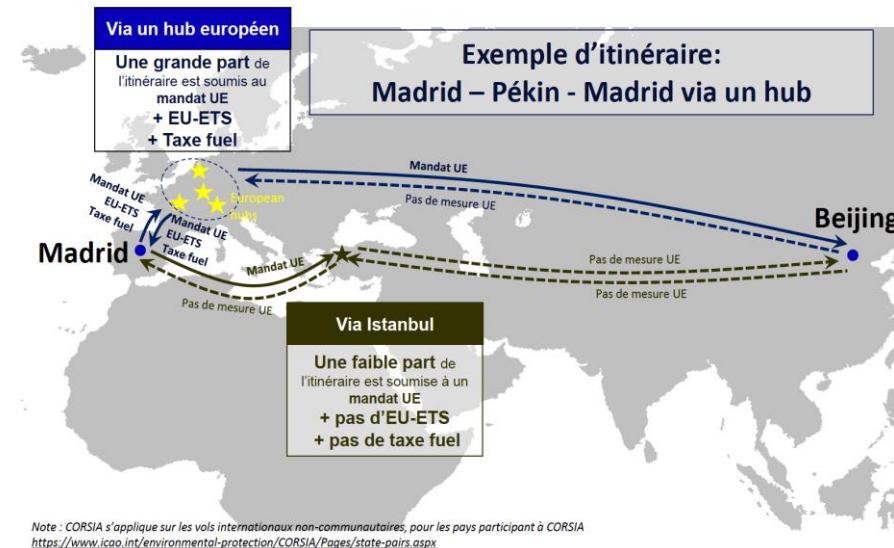
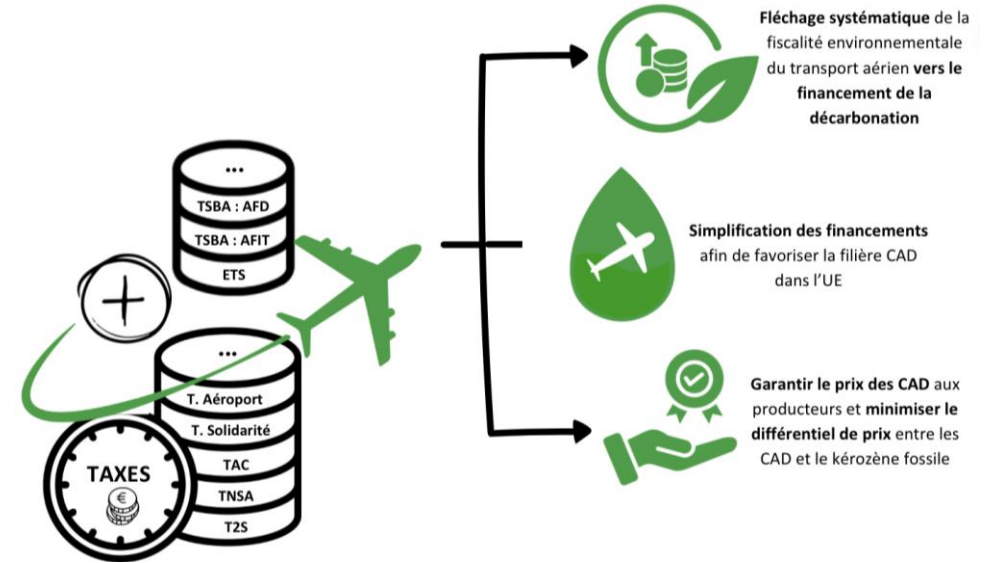
Pascal de Izaguirre
FNAM CEO

FNAM's proposals to promote the energy transition of efficient European air transport at the service of its citizens

Supporting the energy transition in aviation and the development of SAF in Europe

The ecological transition of air transport requires the production of sufficient quantities of Sustainable Aviation Fuels (SAF). It is therefore necessary to go beyond Regulation (EU) 2023/2405, known as REFUEL EU, which sets out the mandatory levels of incorporation of SFF for airlines operating within the European Union. This means :

1. 'Channeling the proceeds of environmental taxes on air transport towards financing aviation decarbonization'.
2. 'Rationalizing and simplifying existing Community funding (e.g., innovation funds) to encourage the production of SAF within the European Union.
3. 'Developing incentive mechanisms that guarantee the price of SAF to producers and minimize the price difference between SAF and kerosene for airlines.
4. 'Accelerating the work of the Renewable Low Carbon Fuels Alliance (RLCF) and the Alliance for Zero Emission Aviation (AZE)'.



European SAF mandate
For identical Origin-Destination traffic flows transiting through a hub, non-EU airlines with a hub outside the EU are significantly less exposed to the additional costs of an SAF mandate than European airlines.

Fuel Tax and EU ETS
European airlines are subject to the EU-ETS and will be subject to fuel tax on the pre and post carriage of connecting passengers to/from their hub. Their non-EU competitors are not subject to these measures.

Preserve the competitiveness of European airlines and a level playing field internationally

Air transport is a globalized and largely liberalized activity. Their competitiveness is closely dependent on the regulatory framework drawn up at Community level, and it is important to ensure that it is appropriate and consistent with that of European airlines' main international competitors (United States, Persian Gulf, Turkey, China). This means in particular :

5. *'Updating the studies on the economic impact of the measures in the European Fitfor55 package in terms of distortion of competition with third-country airlines.'*
6. *'Including air transport issues in the scope of the Carbon Border Adjustment Mechanism (CBAM).'*
7. *'Balancing aviation agreements signed with third countries outside the European Union and include clauses guaranteeing fair conditions of competition and convergence of environmental and social standards.'*
8. *'Incorporating European environmental objectives and standards at international level within the framework of the International Civil Aviation Organization (ICAO).'*



Supporting innovation and the development of solutions to improve air traffic management and passenger facilitation at airports

For years now, European air transport has been suffering from a system of organization and airspace management that fails to deliver the operational efficiency that would enable CO2 emissions to be cut by an estimated 6-10%. The need to overhaul Europe's air navigation system was recognized in the so-called Letta report, which aims to reform the single market to adapt it to major global challenges. Improving the operational performance of Europe's air transport sector will involve :

9. *'Establishing a genuine Single European Sky that is economically, operationally and environmentally efficient. This is even more necessary given the lack of ambition of the previous reform, known as Single European Sky 2+.'*
10. *'Successful implementation by fall 2024 of the so-called EES/ETIAS regulations aimed at improving European border controls for third-country nationals. It is essential that the European Union facilitates this implementation by allowing a gradual approach to implementation and flexibility in the choice of technological solutions.'*





Better Regulation for Better Results

Better Regulation

The competitiveness of European air transport would benefit from the implementation of certain 'better regulation' principles. These would include :

11. *'The adoption of new regulations only when necessary. In particular, the European Union should not adopt regulations that diverge significantly from the main principles that are satisfactory in international air transport (e.g., slot allocation).'*
12. *'Regular use of impact studies and repeal of regulations if they are deemed ineffective'.*
13. *'Regulate the duration for adopting new legislation (e.g., necessary revision of regulation EU 261/2004 on passenger rights that has been lasting for more than ten years).'*
14. *'When drawing up new regulations, particularly in the environmental field, taking due account of the state of science (e.g., the so-called non-CO2 effects of air transport) and guarantee technological neutrality'.*
15. *'Adapting the technical regulations issued by the European Aviation Safety Agency (EASA) to the size and organization of the different types of aviation (general aviation, business aviation, helicopters, ground handling).'*

Make progress on harmonizing social rules applicable to mobile air transport staff

The lack of complete harmonization of the social rules applicable to mobile air transport staff in Europe (particularly as regards the payment of social security contributions) leads to distortions of competition between carriers within the single air transport market and a lack of visibility for flight crews.

These problems have been the subject of various rulings by the European Court of Justice and case law in national courts. The actual implementation of the applicable legislation also differs significantly between Member States. The European Union should therefore undertake the necessary work to :

16. *'Clarify the interpretation of social legislation applicable to mobile air transport personnel and ensure that its application is harmonized'.*
17. *'Complement applicable European legislation where necessary to ensure fair competition between carriers within the single European air transport market'.*

