

November 12<sup>th</sup> 2007

### To the members of the Conciliation Committee on Civil Aviation Security

On November 20<sup>th</sup>, the conciliation process on the revision of Regulation 2320/2002 will officially begin. At this final stage of the co-decision procedure, European Airlines and Airports would like to jointly re-iterate their support of the revision of this Framework Regulation, which would provide significant benefits to both the civil aviation industry and the traveling public.

We are aware of the current discussions between the Council and the European Parliament and of the importance of the remaining issues. However AEA and ACI EUROPE would like to urge the parties involved in the conciliation process not to lose sight of the numerous operational improvements the Framework Regulation would bring to the European aviation security regime as well as to consumers.

Regulation 2320, adopted under great political and time pressure, has proven to be too detailed and unsuitable for the constant evolving security threats. In addition, the changes introduced by several complementary regulations adopted after 2002 need to be reflected in the Framework Regulation and its implementing provisions. For instance, Regulation 1138/2004 on critical parts, significantly improved access control to the apron which rendered the 2320 provisions for additional protection redundant.

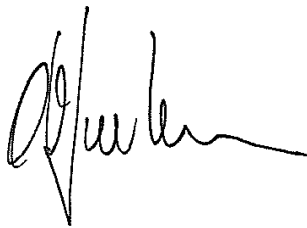
The complexity and inflexibility of the current aviation security rules have led to shortcomings of the European security system. In this regard, the revised 2320/2002 Regulation would introduce significant improvements, which AEA and ACI EUROPE supports, in particular:

- The inclusion of the '**One-Stop Security**' concept which will allow the EU to recognise third-country security standards and avoid multiplication of controls for transfer passengers. The regulatory comitology procedure should be used for the EU to grant this recognition instead of the international agreements. Countries such as Singapore, Japan or Israel could be speedily recognised as secure by using this procedure. It would also enable the EU to react with more flexibility to changes in security standards of the third countries concerned.
- The institutionalisation of **SAGAS** (Stakeholder Advisory Group Aviation Security) is also necessary to ensure that industry and consumers are closely consulted for the development of security rules. SAGAS' role would also be to examine and discuss the potential impact, costs and efficiency of the measures proposed
- The recognition of the protection provided by the **critical parts** would avoid redundant security checks of approximately 80% of aircraft operating at European airports. The costs saved by this reduction of checks could also be reflected in air fares or invested in R&D.

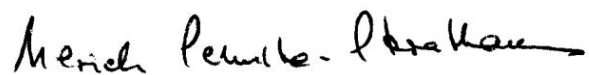
With regards to these benefits, AEA and ACI EUROPE therefore urge the EU institutions to consider the proposed revised Regulation as a sustainable framework which would give significant financial and operational improvements for passengers and, consequently, competitive relief for European Aviation industry.

We remain at your disposal to discuss the issues raised above.

Yours sincerely,



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