

## AEA Policy Paper on transfer of airline passenger data to governments

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Since the terrorist attacks of September 11<sup>th</sup>, a growing number of governments have requested access to airline's passenger data burdening airlines with growing financial costs and inconsistent legal requirements. Moreover these requests, by ignoring the rapid evolution of the airline industry towards paperless travel and one-stop checking/boarding that seek to ease travel, are imposing additional constraints on airlines customers.

The relevant authorities at national, European and international level urgently need to solve these problems. As a contribution to this necessary debate, AEA airlines would like to outline a few general principles that, from an industry point of view, should be included in a global policy.

### AEA Position & Principles

1. Airlines are private entities and should not be systematically required to collect passenger data on behalf of governments for non-aviation related purposes. Homeland security is a genuine government obligation. It should eventually be left to the individuals to provide information to the authorities.
2. Costs associated with the financing of data collection systems should be fully covered by the requesting authorities and the costs of data transmission should be borne by authorities.
3. Airlines have repeatedly stated their preference for a central collection/filtering system at EU level and are willing to participate in its technical definition.
4. The airlines should be free to choose the transmission mode of the required data based on their specific constraints and operations.
5. Airlines should not be required to collect data unrelated to the travelling needs of their passengers and should not be liable for the accuracy and the completeness of data that are given by passengers.
6. The number of transmissions should be kept to a minimum avoiding as much as possible redundant requests through rationalization of the legal requirements.
7. Implementation of the single-window principle, including at EU level, is pivotal to avoid redundant costs and increase efficiency.
8. Governments should work towards and apply an international data transfer standard in the context of ICAO (International Civil Aviation Organisation) in order to preclude inconsistent if not incompatible requirements.
9. The airline industry should be closely involved and consulted to ensure that security needs are fully addressed and the efficiency of the air transport industry is improved by facilitating the journeys of bona fide travellers.
10. Requirements should be applied in the same manner and timescale to all airlines and all modes of transportation irrespective of their business model and nationality
11. Impacts of EU requirements on international relations with third countries should be fully analysed and managed at EU level