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Comments from International Air Transport Association (IATA), on a proposal on regulatory changes in the Aviation Security Act (2004:1100), regarding airport owners' costs for security checks

The International Air Transport Association (IATA) is a global trade association, representing some 290 airline members across the world and accounting for 82% of total global air traffic. Our members include approximately 50 airlines operating air services to/from Sweden. IATA supports many areas of aviation activity and helps to formulate industry policy on critical aviation issues to drive a safe, secure, and a sustainable industry. For more information on IATA and its work, you can visit www.iata.org

IATA welcomes the opportunity to comment on the Swedish Government's proposal on amendment to the Act (2004: 1100) on aviation security, in order to enable that airport holders' costs of security checks of passengers and their luggage may be partially covered in other ways than by a fee from the airlines in order to handle the deficits in the system caused by the impact of the Covid-19 pandemic accumulated by the end of 2021.

COMMENTS ON THE PROPOSAL ON AMENDMENTS OF THE ACT (2004: 1100) ON AVIATION SECURITY:

Travel restrictions and other Covid19 related measures caused the sharpest traffic decline in aviation history by far. This caused a deficit in the Swedish fee equalization system on security charges. According to the Swedish Transport Agency the accumulated deficit in the fee equalization system was estimated to amount to SEK 753 million by the end of 2021.

IATA's position is that the deficit that occurred due to the Covid-19 pandemic should not be financed by the airlines and therefore welcomes the proposal on amendments of the Aviation Security Act (2004:1100) to enable other sources to finance the deficit in the fee equalization system. IATA would however suggest to not limit the measure in time as Covid-19 and the geopolitical situation following the Russian invasion in Ukraine will still be impacting traffic demand during 2022. Rather, a reassessment of the situation by the end of 2022 to confirm the viability of the fee equalization system would be preferable before setting a deadline.

It is important that a decision on amendments of the Aviation Security Act (2004:1100) is followed by a decision on financial support from the state to cover the deficit.

In more general terms and with a view to future discussions on the Swedish Fee Equalization System, we refer to [IATA's Position on Security Charges](#).



COMMENTS ON THE ANALYSES ON THE IMPACT ON THE ENVIRONMENT AND CLIMATE:

IATA does not support the analysis outlined in paragraph 5.4 (page 10) regarding “other consequences” concluding that the environment and climate would be indirectly affected negatively if the competitiveness of the airline industry would be improved. On the contrary, sustainable aviation requires a sound economy, as the green transition in aviation requires significant investments as well as other coordinated efforts of the entire industry (airlines, airports, air navigation service providers, manufacturers) and significant government support.

Within the charges airport users/passengers pay to the airport, the investment in green infrastructure is already covered and is being paid for. In other words, air transport is already paying for its sustainable infrastructure.

We thank you in advance for taking these comments into account.

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