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**Comments from International Air Transport Association (IATA), concerning a proposal on differentiated takeoff and landing fees, based on climate impact**

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 was founded in 1945 to promote safe, regular and economical air transport for the benefit of the peoples of the world and to provide means for collaboration among the enterprises engaged in international air transport, as well as to cooperate with ICAO and other international organizations.

Airport charges are paid by airlines for the use of airport facilities and services. They are part of the total price passengers or freight customers pay for air transport services. Airport charges constitute a major part of airports' incomes and a non-negligible part of airlines' operating costs. It is critical to ensure that airport charges are reasonable, cost-related, transparent and non-discriminatory, in accordance with ICAO policies.

The proposal to introduce modulated takeoff and landing fees based on the climate impact, would further add to the emergence of a patchwork of local and national measures purporting to address climate change that will only serve to undermine the multilateral cooperation required at the global level for sustained climate action and meaningful progress through more appropriate mechanisms. Such charges would also fail to meet agreed international policies, notably the principles that emissions should only be accounted for once and that airport charges should be related to the provision of infrastructure and services provided.

IATA strongly urges airports and ANSPs to stay within the remit of their role as infrastructure and services providers. Through existing carbon pricing instruments and the cost of fuel, airlines are already strongly incentivized to utilize fuel-efficient aircraft and to operate those aircraft as efficiently as possible. Any unilateral action by individual states or actors, will result in limited or no additional environmental benefit. Initiatives that would simply displace emissions within the air transport system rather than result in any significant reduction in global emissions are not an appropriate means to achieve sustained decarbonization.

To the extent that airport charges are to be imposed or modulated for environmental purposes, internationally agreed policy dictates that this should only be directly related to the provision of specific infrastructure or services. These types of fees are already included in the charges at Arlanda and Landvetter. Airport charges should not be used to address broader policy objectives or environmental effects that have no demonstrated local impacts.

Airlines have been investing in new and more fuel-efficient aircraft for decades: each new generation of aircraft is on average 20% more fuel efficient than the model it replaces. Since 2000, the fuel efficiency of the global fleet has improved by 38%. While the charges that may be applied to an aircraft are considered by airlines as part of their fleet planning, they are just one of many factors such as the performance of the aircraft, marketing, infrastructure and the economics of operating a specific aircraft type to a specific airport.



IATA recognizes the need to address the global challenge of climate change and the international aviation industry has adopted a set of ambitious targets to mitigate CO<sub>2</sub> emissions from air transport. The industry is confident that technology, operational measures and better infrastructure will provide long-term solutions to ensure the sustainable growth of the aviation industry through partnership between industry and government.

Governments play an important role in supporting investment in research and development in academic institutions to drive innovation through joint programmes with industry partners. Such initiatives will contribute to the decarbonization of air transport in a meaningful way and we encourage governments to explore these in pursuit of more concrete environmental benefits, rather than to introduce less effective measures that go against international policy without realizing the suggested impact on climate.

Indeed, the proposed differentiated fees will ensure an additional burden without effectively addressing the environmental challenge we are facing. This is particularly precarious in the midst of an ongoing pandemic crisis and IATA continues to urge for government relief measures to sustain airlines financially and to support a safe restart of aviation to restore connectivity.

Aviation plays a unique role in connecting business to markets, in reuniting family and friends, in discovering new cultures and lands, in bringing people together to solve problems, as well as in building understanding and developing global insights. The impact of COVID-19 related border and travel restrictions have effectively closed down the industry, grounding planes and leaving infrastructure and aircraft manufacturing capacity idle. Supporting innovation as the industry recovers is one more way the government can provide relief while also promoting real progress that can practically affect the global environmental challenge.

If there is anything IATA can assist with, I invite you to contact me or Ms. Catrin Mattson, IATA's Area Manager in the Nordic & Baltic region, who is based locally in our Stockholm office.

Best regards,

A handwritten signature in blue ink, appearing to read "Rafael Schwartzman", with a stylized flourish at the end.

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