

# **DANISH AVIATION**

**SUMMARY OF THE REPORT FROM THE COMMITTEE OF DANISH AVIATION**

**March, 2012**

## **Summary**

The aviation industry's significance to Danish society and the fierce international competition in the entire aviation sector necessitate a good and competitive framework for Danish aviation.

Due to these circumstances, an aviation committee with representatives from the aviation industry and various organizations and politically appointed members have in this paper conducted a comprehensive assessment of the conditions which in future will create the foundation for as well as promote a continued development of an efficient and competitive Danish aviation industry in relation to the numerous possibilities, requirements and expectations which the industry is facing.

### ***Aviation in Denmark***

Overall, the main actors in Danish aviation are passengers, air carriers, airports, air traffic services and various subcontractors, such as caterers, authorities, etc.

The employees in the Danish aviation industry include airline staff directly employed and based in Denmark or at Danish airports, and people who work indirectly in related industries, such as aircraft repair and maintenance. In addition, the aviation industry creates a number of jobs due to consumption of employees in the aviation industry as well as jobs that exist because of catalytic effects, e.g. in the tourism industry. Overall, the International Aviation Transport Association (IATA) estimates that the Danish aviation industry generates approx. 45,000 jobs.

In Denmark, there are 10 major publicly available airports each carrying more than 15,000 passengers annually. Copenhagen Airport is a key component in a route network of these airports that is partly supported by the surrounding provincial airports. Copenhagen Airport has the largest number of passengers, while Billund is the largest provincial airport. At present, most of the flights to and from Denmark are via Copenhagen Airport and Billund Airport.

The total number of passengers in major Danish airports has been increasing in recent years (except from 2008) from nearly 24 million passengers in 2005 to about 28 million passengers in 2011. The total cargo volume, which was transported by air to Copenhagen and Billund Airports (the main cargo airports), has varied over the this period. In 2011 it amounted to 396,000 tons.

There are 23 air carriers holding a Danish EU license to provide air services and two North Atlantic carriers, which hold a Danish license to provide air services carrying passengers, cargo and mail etc. According to their recent financial statements, the three largest carriers in terms of turnover are the SAS Group, Thomas Cook Airlines Scandinavia A/S and Cimber Sterling A/S.

As regards aviation education, the growth in the aviation industry entails an increasing demand for pilots as well as for air traffic controllers, flight engineers etc. However, the industry cannot depend on newly trained automatically applying for jobs in Denmark. In addition, the future pilots have difficulties in obtaining the financing acquired for education. In 2011, 72 private pilot certificates and 84 commercial pilot licenses were issued.

Air traffic management in Danish airspace is mainly conducted by Naviair designated by the Danish state. Between 2005-2011, excluding 2009, there has been over 600,000 flights by instrument flights rules in Danish airspace.

In 2009 a Danish-Swedish functional airspace block was established, so that the airspace is not dependent on national borders. The same year, the Danish-Swedish company Nordic Unified Air Traffic Control (NUAC) was formed which will take over the operation of air traffic control, i.e. overflights etc., in both Danish and Swedish airspace in 2012.

### ***The Regulatory Framework for Aviation***

The regulation of air transport is mostly carried out at international level. This applies to both the auspices of the International Civil Aviation Organization (ICAO), whose provisions have been implemented into national regulation, both in the Danish Air Navigation Act and related regulations

(Regulations for Civil Aviation) and in the EU. EU regulation is playing an increasingly important role and has precedence over national aviation legislation.

In areas where no EU regulation exists, the national aviation legislation applies which also applies to Greenland and the Faroe Islands. However, as the Danish Air Navigation Act specifies the framework for regulatory matters under the Chicago Convention and also comprises some basic rules for e.g. area of application, it still has fundamental importance.

After several years with gradual liberalisation in the EU, a single European aviation market was created in 1992 with uniform criteria for the licensing of EU owned airlines, free market access within the EU to these carriers and, in principle, free ticket pricing.

There is also the EU regulations on the Single European Sky and the technology and the procedures which in this connection are needed (SESAR project). Rules on passenger rights also exist in the event of cancellations, delays and denied boarding and there are also rules for the agreement of Cooperation with the European Organization for the Safety of Air Navigation, Eurocontrol and the basic rules on civil aviation and the European Aviation Safety Agency (EASA).

EU legislation negotiations from spring 2012 include new rules regarding ground handling, slots, noise and air services agreements between the EU and third countries.

The security area of civil aviation and the initiatives aimed at preventing terrorist acts are also mainly regulated at EU level. But in Denmark, there are also national security provisions to be expected to be settled when EU rules are fully implemented. The objective is that flight safety in Denmark is continuously improved and that there are no crimes against aviation security. However, it can be extremely costly to implement comprehensive security measures. It is therefore necessary to incorporate the costs of implementing various security measures.

Regarding the rules on travel guarantee and bankruptcy cover, the travel guarantee scheme was extended to include individual air transport. The reason for this extension was to strengthen consumer protection so it is now compulsory for airlines to offer customers compensation by the Danish Travel Guarantee Fund. However, it is optional for the customer to choose compensation. Although the scheme on insolvency coverage for an individual flight is a Danish arrangement - as opposed to if the flight is included in a package holiday and are thus subject to EU rules - it includes a large number of foreign airlines which are established in Denmark.

EU regulations on flight regulation for airline crew came into force in 2008. The rules are an expression of a compromise between EU Member States and it is the result of a protracted process. The EASA has recently published the Comment Response Document which forms the basis for the further process, which also include the presentation to the harmonization of the area. This process is ongoing.

The aviation industry's payment for the supervision of the Danish Transport Authority is based on full user funding. Total user fees determined by the Danish Transport Authority is a total cost of the supervision with civil aviation. There is also a cross-subsidy from the large private flights and small and medium-sized aircraft. In this way, the so-called undergrowth in Danish aviation is supported. Overall, aviation fees with effect from 1 January 2012 has decreased by 10%.

Air transport is subject to taxation, e.g. in the form of fees paid in connection with registration in the nationality registry and mortgage in the registry of rights to aircraft, and in some cases VAT.

There are specific requirements relating to nationality registry and in the registry of rights to aircraft in Denmark, and there should be payment in connection with this in the form of fees to the Danish Transport Authority and taxes to the state.

There are visa requirements for entry to Denmark for citizens from various countries. A special tourist visa regimes for certain countries (Russia, Ukraine, China and India) has been introduced which makes it easier for nationals of those countries to enter Denmark for tourist visits.

The ongoing case of Terminal A concerns the privately owned Terminal A ApS, which has the objective

of constructing a new competing terminal in an area at Copenhagen Airport – an area that is owned by Copenhagen Airports A/S, but Terminal A ApS wants the right to rent this area. Copenhagen Airport has refused to give Terminal A ApS access to lease the area. This process is also ongoing.

### ***Danish Domestic Aviation***

Flight routes from Danish provincial airports can help to ensure a high level of regional accessibility. It is important for regional development, especially for remote areas where travel time to Copenhagen is considerably shorter by plane than by train, car and ferry.

Most of the Danish provincial airports are located in remote areas where they can contribute to very short travel times to Copenhagen. In this matter, domestic aviation plays a special role.

Today, there are domestic flights between Copenhagen Airport and Aalborg, Aarhus (Tirstrup), Karup, Billund, Bornholm and Sønderborg. In addition, some routes between Copenhagen Airport and Kangerlussuaq in Greenland as well as between different airports in Denmark and Vagár Airport in the Faroe Islands in Denmark are considered domestic flights.

Domestic air traffic is challenged by recent significant improvements in infrastructure and in particular the establishment of the Great Belt Link, the strengthening of the railway and the motorway network. The establishment of the Great Belt in 1998 was of great importance for a number of provincial airports. Several of the former domestic flight routes to and from Copenhagen were closed down in the years after opening, including from Odense and Esbjerg.

Since 1993, domestic aviation has been fully liberalized and operates on commercial terms, where the number of departures and price conditions are established by private operators.

The total number of passengers on domestic flights in Danish airports amounted to 4,665,000 in 2011, which represents 16.6% of the total amount of passengers.

### ***Danish International Aviation including Global Availability***

Copenhagen Airport's role in the European airport hierarchy is changing. From a position as the tenth largest European airport in 1998, Copenhagen Airport dropped to number 16 in 2008, in spite of steadily growing passenger number of over 20 million annually.

The annual average growth of 1.8% is less than many other airports have experienced and Copenhagen Airport's position as a north European hub with many intercontinental flights is gradually weakened. However, Copenhagen Airport has moved from being the 16th largest airport to 14th largest in Europe in the period 2008-2011 with a passenger volume of 22.7 million in 2011.

There are a number of challenges associated with maintaining Copenhagen Airport as an international hub, which has established the basis for more routes with more frequencies compared to a situation where the passenger catchment alone would consist of traveling to and from Denmark.

Airports in Jutland with international accessibility include Billund, Aalborg and Aarhus. Billund Airport had a total of 2.34 million international passengers in 2011.

International aviation includes freight and goods by air which typically transport goods, that are relatively expensive, compact and highly perishable. Air cargo is an important component of the freight logistics which are included in both exports and imports. Globalization entails that there is a need for fast and relatively cheap transportation of goods over long distances. This need is expected to increase. Many Danish companies produce products with high knowledge and design content. It is relatively expensive goods and those goods are thus of high value and the companies can afford to use transport by aircraft. This requires sound possibilities to transport freight by aircraft.

International aviation also includes charter flights which within the EU/EEA with the establishment of the internal aviation market has been liberalized and now has uniform requirements. Charter services to and from third countries is reciprocity-based and according to the National Charter provisions for

outgoing and incoming charter. The Danish rules for charter flights between Denmark and third countries have special significance for flights to the Canaries, not covered by the EU internal aviation market, Turkey, some countries in North Africa and Thailand. In 2010, a total of 2.5 million charter passengers were carried to and from Danish airports. It is estimated that there is a growth potential of the 'inbound' traffic, including the accompanying tourism.

### ***Aviation and the Environment***

Over the past 20 years air transport has been the transport form that has experienced the highest growth and this growth is expected to continue. Air transport involves a strain on the environment and therefore there will be an increased focus on the relationship between aviation, energy and the environment.

Like other forms of transport, air transport affects the environment as well as climate. The environmental impact of aviation manifests itself in different ways. Now and in a foreseeable future, aircraft use fuel which largely consists of kerosene. At the time of the combustion of the fuel, CO<sub>2</sub> is emitted into the atmosphere. In relation to the environmental impact of aviation, there is consensus that a regulation of the environmental impact of aviation should be carried out at a global level, as aviation is global and its effects are predominantly of a cross-border nature.

The global CO<sub>2</sub> emission makes up approximately 2%, while the Danish domestic flights account for less than 0.5% of Denmark's CO<sub>2</sub> emissions. At EU level, it has been decided that greenhouse gases from aviation must be reduced. From 2012, aviation should be covered by the EU Emission Trading Scheme, which applies to all flights within the EU and to and from EU countries.

Further, there is a technological development of aircraft and aircraft engines with reduction of emission as a result, as well as research and testing of the use of alternative fuels, including for aviation.

Copenhagen Airport is the first European airport to launch several initiatives to improve air quality and thus the working environment for employees who work amongst the aircrafts.

In addition, both at EU level and at national level in Denmark, important initiatives related to the efficiency of air traffic control have been taken, which ultimately entails less fuel consumption.

With regards to noise pollution from aviation, noise levels have generally been decreasing due to the phasing out the noisiest aircraft types. However, continuously increasing travel activities by aircraft may cause increased noise pollution. Both under international auspices of ICAO and the EU and nationally measures to solve the noise problems in the most cost-effective manner have been established.

### ***Aviation in the Overall Transport System***

The connections to Denmark's nine largest airports are described in summary form, including road and rail infrastructure's interplay with other forms of public transport. Reference is made to the political agreement "A Green Transport Policy" from 2009.

Since January 2009, the parties of the agreement, as part of the 10 broad political agreements on transport investment, allocated 97 billion DKK for investments in railways, stations, roads etc. In addition, investments were made in a fixed link across the Fehmarn Belt and the Metro City Ring in Copenhagen. The overall objective is to further develop the transport system and improve the mobility of the Danes.

There is also a need for a coherent strategic planning and prioritization of long-term efforts after 2020. Therefore, a number of strategic analyses of future traffic challenges and possible solutions have been initiated. Focus is on the traffic challenges and strategic choices that await the other side of 2020.

The work on the strategic analyses will be completed in 2013 when all parts of the analyses are completed and there is a comprehensive basis for decision. Based on the analyses, the strategic priorities of the planning of Denmark's infrastructure on the other side of 2020 can be discussed.

### ***Aviation Policies and Initiatives in Other Countries***

The political situation concerning aviation in Germany, the Netherlands, Sweden, Norway and Finland has been studied. Particularly interesting in this context is the expected opening of major airport Berlin-Brandenburg in June 2012 which implies that all air traffic to and from Berlin is carried out at a single airport. A passenger rate of up to 27 million is expected in 2012.

In addition, initiatives that successive Dutch governments and industry have undertaken are worth mentioning as they have managed to create two successful hubs at Schiphol Airport and Rotterdam Harbour. Finally, it should be mentioned that passenger fees of a fiscal nature is currently only existing in Germany and Finland. A passenger fee was also introduced in the Netherlands on 1 July 2008, but suspended after one year.

### ***Growth Potential of Danish Aviation***

It should be underlined that a high level of international availability is crucial to ensure Danish exports and the attraction of foreign investment so that foreign companies choose to establish their growth-enhancing headquarters in Denmark. More precisely, the high level of availability is reflected in efficient travels for Danish businesses in their dealings with foreign business people in and outside Denmark. It is particularly through this rapid and efficient mode of transport that Denmark's accessibility to the rest of the world is ensured.

This report looks into a definition of the aviation industry. It also outlines the market trends based on the last 10-15 years of growth in European and international aviation. In this connection, the liberalization of European aviation, which began in the mid 1990s, has been the crucial factor. The most prominent business models for airlines are examined, including charter and cargo as well as future development prospects. Furthermore, there is a focus on trends in customer travel pattern and consumer behavior.

According to an OECD report, there is a direct correlation between air transport and the growth in the total world economy. According to Copenhagen Economics, negative consequences will arise for the part of business life that depends on having a number of international destinations available, if Denmark's international accessibility is affected.

Copenhagen Economics estimates that a loss of hub function in Copenhagen Airport will result in an expected reduction in traffic volume of at least 25% which corresponds to approximately 5 million journeys a year. It is expected that a decline in traffic volume of this size will cause a job loss of about 5,500 jobs over several years in the directly airport related employment.

## The Committee agreed upon the following strategic areas:

### Strategic areas:

- 1. EUROPEAN AND GLOBAL AVAILABILITY:** Denmark should have a cost-efficient and competitive aviation industry providing many international connections and thereby a high level of availability for both passengers and freight. Accessibility is vital to ensure that Denmark takes part in and attracts as many parts of the global value chain as possible. There must be a high level of international availability of Danish people, Danish companies and travellers from other countries to Denmark and via Danish airports.
- 2. CPH AS A NORTHERN EUROPEAN AIR TRAFFIC HUB:** Copenhagen Airport is facing increased competition from several large northern European airports, including the transfer traffic that today is helping to ensure more routes which the Danish people otherwise would not have access to. Copenhagen Airport is to maintain and develop its position as an international hub for air traffic in Scandinavia and the Baltic Sea region. There is a need for an efficient interplay between all actors involved to achieve this goal.
- 3. EFFECTIVE DOMESTIC AVIATION:** Creating good conditions for an effective and market-oriented Danish domestic aviation is crucial as air transport is an essential part of the public transport in Denmark. Airports such as Aalborg, Aarhus, Sønderborg, Rønne and Karup are paramount for the accessibility of the local business community. Danish domestic aviation is also a key element in connecting the country and the Danish Realm (Denmark, the Faroe Islands and Greenland) closer together and today forms the basis for some of the country's main transport corridors for passenger traffic.
- 4. CLOSE INTERPLAY BETWEEN THE DIFFERENT MODES OF TRANSPORT:** Focus must be on coordinating the various modes of transport of passengers and goods as well as on the regional transport companies.
- 5. AN ENVIRONMENTALLY FRIENDLY AND ENERGY EFFICIENT AVIATION:** Future aviation must limit its strains on the environment and energy as much as possible. The aviation industry and authorities must work together to support this. Environmentally friendly and energy efficient technologies, such as biofuels, should be promoted to strengthen innovation within the industry.
- 6. AVIATION IN INTERNATIONAL SETTINGS:** The framework for aviation is highly regulated by international law. Denmark must actively promote modern and efficient aviation through the EU, UN and other forums in order to provide transparent, simple and effective rules that will ensure fair competitive conditions globally.
- 7. SAFETY AND SECURITY:** Passengers must feel a sense of safety when flying and security measures for both passengers and cargo must be risk-based and effective. These measures must be applied at international level. Both consumers and users must know their rights. Safety at work throughout the aviation industry is also of high importance.
- 8. GOOD EDUCATION, TECHNOLOGICAL DEVELOPMENT AND SECURE WORKPLACES:** A competitive aviation industry requires research, technology and skilled employees in all parts of the industry. Education and training are important parameters of competition in the global competition. Highly skilled aviation staff and secure workplaces will be a cornerstone in the development of the Danish aviation industry in the coming years. Research institutes should participate in this process.
- 9. AVIATION INFRASTRUCTURE:** The aviation infrastructure (airports and airspace) must be effective and contribute to cost-effective processes with air carriers and their suppliers. The aviation infrastructure's capacity, safety, quality and cost must be competitive and create opportunities for continued growth in both passenger and freight carriers. The aviation

infrastructure must be provided on transparent and fair conditions.

**10. A FORWARD LOOKING DIALOGUE:** It is recommended that the Minister of Transport every second year publishes an aviation policy report. This report may be discussed in a Danish Aviation Council with representatives from the industry in a broad sense, passengers, authorities and the business community. The Council may provide recommendations to the Minister of Transport on current aviation issues, including the strategy for domestic aviation.

### **The Aviation Committee has, based on the strategic areas, discussed the following specific subjects:**

#### **1. EUROPEAN AND GLOBAL AVAILABILITY:**

- Growth in Danish aviation cannot be achieved merely by an increased number of Danes flying. It is recommended to facilitate specific projects designed to support the marketing of Denmark as travel destination, e.g. through Global Connected, so that more foreigners travel to and from Denmark and thereby Danish airports. Efforts to achieve this should involve different parts of the Danish aviation industry.
- Danish aviation must increasingly become a part in the Danish growth and business policies in order for Denmark to utilise the benefits of globalisation, e.g. in relation to the BRIC strategy. This is crucial to ensure the necessary global mobility and internationally competitive environment.
- Against this background, the Committee finds that the reintroduction of a passenger tax is not appropriate. The Danish Consumer Council however cannot endorse this view; see appendix 3.
- It is recommended to complete an improved coordination of the resources available for the marketing of Denmark as a destination in order to create the best possible market conditions for existing and new air routes to and from Denmark.
- A study of Danish practice is recommended to be carried out in relation to visa rules for entry to Denmark, which includes e.g. an extension of the travel agency arrangement to ensure good conditions for business and residential tourism in the country.

#### **2. CPH AS A NORTH EUROPEAN AIR TRAFFIC HUB:**

- The Committee finds it essential to preserve Copenhagen Airport's role as a northern European hub in competition with e.g. Schiphol and the new major airport Brandenburg. Therefore, Copenhagen Airport's unique position must be secured. The Committee believes that it is important to preserve and develop the integration of the airport terminal system which is a crucial part of the prerequisites for a well-functioning hub. The Committee finds that the idea of alternative passenger terminals at Copenhagen Airport will weaken Copenhagen's function as a hub. The Danish Consumer Council do not endorse this view; see appendix 3.
- A permanent stakeholder committee should be established with participation of all key stakeholders in relation to Copenhagen Airport. The task of the committee should be to coordinate national efforts in the development of Copenhagen Airport as the best northern European hub. Copenhagen Airport has the presidency in this work.

#### **3. EFFECTIVE DOMESTIC AVIATION:**

- Danish aviation policy must ensure that air transport is prioritised as an important part of public transport in Denmark. Airports like Aalborg, Aarhus, Sønderborg, Rønne and Karup are



crucial for the accessibility of the local business community.

- Parts of the Danish Realm have special needs for good transport connections and security of supply, including aviation. This applies to Bornholm, Greenland and the Faroe Islands. It is recommended that the Ministry of Transport's analysis of framework conditions for transport to and from Bornholm is included in a future strategy for domestic air transport as there may be a need for a special effort.

#### **4. CLOSE INTERPLAY BETWEEN THE DIFFERENT MODES OF TRANSPORT:**

- Good road and rail connections to the airports are key factors. Accessibility to the airports should therefore be included in the prioritization of the extension of the transport infrastructure. The opportunities for and the consequences of linking Copenhagen Airport to a north European high-speed network should be explored, also in relation to the overall transport networks in the European Union.
- Copenhagen Airport and Billund Airport are the major airports for air cargo to and from Denmark. As regards foreign trade and exports, it is crucial to ensure a reasonable framework for air cargo among authorities, logistics companies and air carriers.
- There should also be close interplay between aviation and other modes of transport, including buses, trains and taxis, in order to increase the airport's catchment areas. It should be easy to get to and from the airports on time, both for public transport and freight. This requires dialogue and joint planning, including increased focus among regional transport companies.

#### **5. ENVIRONMENTALLY FRIENDLY AND ENERGY EFFICIENT AVIATION:**

- The Committee has discussed the idea, also due to environmental reasons, of introducing a new passenger fee, including the international experiences. Against this background the Committee believes that this is not a good idea. Instead, focus must be on the environmental improvements which the development of aviation technology permits. The Danish Consumer Council do not endorse this view; see appendix 3
- It must be investigated which possibilities exist to support the technological and scientific product development of sustainable fuels for aviation. It is recommended that co-operation be established across sectors between investors, companies (manufacturers, suppliers, air carriers) and public stakeholders in order to promote this objective.

#### **6. AVIATION IN INTERNATIONAL SETTINGS:**

- Denmark should work towards getting the EU to prioritise global harmonisation, especially in relation to countries with great mutual aviation activity.
- It is recommended that Denmark maintains focus on security requirements being proportional. The Committee notes that the Minister of Transport has raised the issue of aviation safety and security during the Danish EU Presidency at European level.
- It is recommended that re-registration of aircrafts from another EU country's registry to the Danish registry is facilitated. This can be done by removing the special Danish registration fees, by carrying out the issuance of airworthiness certificates in connection with the registration in accordance with existing EASA regulations as well as by only requiring the necessary documentation for the issuance.
- The Committee recommends that the Danish special rules, including corporate aviation rules, are examined.
- It is recommended that Denmark should work towards a revision of the EU regulations on the

maintenance requirements of the General Aviation industry, including small General Aviation aircrafts, so the requirements for administration will be reduced. In addition, Denmark should work towards a revision of the EU regulations for flight engineer certificates so the requirement to document experience in "six months within the past 24 months on the type of" is eased.

- There is a need for increased focus on compliance with competition rules within the aviation area, including airports and air carriers, both within the EU as more specifically in Denmark.

## **7. SAFETY AND SECURITY:**

- It is recommended that Denmark works through the EU towards maintaining a high level of flight safety for civil aviation. Safety must not be questioned.
- Danish aviation policy should ensure that Denmark plays an active role in improving the regulations on passenger rights. It is recommended that passenger rights in EU Regulation 261/2004 are ensured through stricter penalties at European level and that the meaning of "extraordinary circumstances" relating to "natural forces' impact on aviation" be clarified.
- It is recommended that the advantages and disadvantages of the current system of travel guarantee and bankruptcy cover should be examined so that a higher number of airlines are covered. It is recommended that work of facilitating a bankrupt scheme at European level be continued.
- A risk-based approach to security processes is vital in order for the risk tolerance to be defined and formulated in a realistic as well as measurable manner. It is important that freight is included in this context. In addition, the formation and implementation of rules should be based on "One - Stop Security".
- The consequences of future amendments of the security and safety rules must be closely examined before any amendments are made.

## **8. QUALITY TRAINING, TECHNOLOGICAL DEVELOPMENT AND SAFE WORKPLACES:**

- Denmark must have a high quality of aviation training. There will be a continued need for aviation personnel so a lack of qualified personnel is no hindrance. The focus should be on training of professionals.
- A number of working environment problems within aviation, such as particle pollution, noise, physical and mental stress, should be examined. It is recommended to examine whether it is possible to facilitate a reduction in exposure to particulate pollutants from internal combustion engines, as part of the government's green business support schemes.
- It is recommended to examine the basis for all employed at airports should have introductory training so that the various employee groups have the same basic knowledge and understanding of work processes, safety rules, working environment and the environment.
- One of the terms and conditions of working in the industry is the changing working hours which puts pressure on the employee and his/her family relations. To a large extent, the ergonomic effects happen in connection with aircraft "turnaround". It is recommended that the industry works systematically to gather experience and develop recommendations in this area.

## **9. AVIATION INFRASTRUCTURE:**

- There should be transparent inspection processes, user influence and benchmarking in relation to relevant competing infrastructure providers as this provides the basis for setting objectives for quality, efficiency and prices.
- It is recommended that the Danish Aviation Council discusses the regulation of the Danish airports and related infrastructure.
- It is recommended that the Danish Transport Authority's inspection, which currently is paid by all Danish licence holders, aircraft owners, flight students, training organizations and aircraft companies, in future seek financing through a more uniform safety fee of approximately 6 DKK per passenger. The proposal would entail that the Danish air carriers, airports etc. collectively will have reduced their current payment to the Danish Transport Authority, and that foreign air carriers will contribute to the inspection activities.

## **10. A FORWARD-LOOKING DIALOGUE**