

Commission's green efforts are a smokescreen for cost-reduction, liberalisation and further fragmentation of the ATM system

To the Members of the European Parliament

Dear Members of the European Parliament,
Dear colleagues,

We are writing to you to raise our concerns around the Single European Sky SES2+ recast and the environmental improvements this reform the European Commission claims it will bring through a reform of the air traffic management (ATM) industry. We believe that the Commission's emphasis on the positive environmental effects of the reform is being used to focus the attention away from the negative social impacts. At the same time, the ATM system improvements foreseen in the strategy are unrealistic as the proposed measures will not incentivise change.

When the European Commission presented the Single European Sky SES2+ recast proposal in autumn last year, this updated regulatory framework was advertised as something that will reduce air transport emissions by up to 10% thanks to more direct flightpaths and a more efficient ATM system. The 10% figure has been brought to the table many times since then. Subsequently, Eurocontrol published the [European ATM Network Fuel Inefficiency Study](#), pointing out that flights in Europe are using on average between 8.6 % and 11.2 % more fuel than the most efficient flights. Moreover, the representatives of the European Commission made references to the study on several occasions in the European Parliament committee meetings. They reiterated the positive effect SES2+ would have on the environment.

The ETF is committed to finding and supporting measures that aim to reduce the negative environmental footprint the aviation sector generates. We don't believe, however, that the Commission's SES2+ proposal fits this criterion, and we find the 10%-reduction-in-CO2-emissions-discussion misleading. We believe that the approach taken by the European Commission is greenwashing at its best. Their environmental claims serve purely as a cover for the more serious changes that are being pushed through with little discussion, such as cost-reduction, liberalisation and further fragmentation of the European air traffic management system.

The arguments the Commission uses to defend their environmentally-friendly claims are based on shaky grounds. European aviation burns jet fuels and generates emissions, CO₂, non-CO₂, noise emission and the like. The Fuel Inefficiency study

by Eurocontrol focused solely on the use of conventional jet fuel burn and CO2 emission. It states that if aircraft would fly in the most efficient way possible, a significant amount of fuel - around 10 % - could be saved. However, what the paper also exposes, and is conveniently ignored in the environmental debates around SES2+, is that “not all ATM inefficiencies can be eliminated”. In other words, having the perfect, most efficient ATM system is just a hypothetical example.

The Eurocontrol study finds that we would see significant fuel savings and, in turn, significant CO2 emission reductions *if* certain conditions were met. However, these conditions cannot be met in the real world. Figures in the study demonstrate that even during the COVID-19 pandemic, when skies were not congested and flights could be direct, the ATM was still not 100 % efficient because it simply cannot be. Even in the best possible conditions with few network restrictions and direct routes at fuel-efficient flight levels, there were certain inefficiencies out there, around 2 %, that could not be reduced.

Persistent inefficiencies in European ATM systems that SES2+ is unlikely to solve
(In)direct flight routes | One example can be the elimination of a huge number of airspace restrictions, allowing aircraft to fly more direct flight routes. It seems like an easy thing to have - in theory - but it is not feasible in practice. Dispersed across the European skies, there are too many areas defined as special use airspace which have to be avoided when flying from point A to B. They are typically military areas. It is not realistic to expect that these could be removed anytime soon, for historical and national sovereignty reasons, so that aircraft could fly directly over them rather than fly around, taking a bit longer route.

(In)direct takeoff and landing paths | Another example can be that aircraft could take off, fly ahead and land, without circling around the airports, which would make the paths shorter and therefore better for the environment. However, this is not possible in the real world because planes cannot take off or land just in any direction. While taking off and landing, many other factors have to be taken into consideration, such as wind direction or the length of a runway. As much as direct takeoff and landing paths would be nice to have, they are not realistic.

Holding patterns | Similarly, some aircraft can be seen doing holding patterns, flying in circles above an airport, waiting to land. Cutting those would make the flown trajectory shorter and better for the environment. However, holding patterns occur for various reasons, some of which are staffing and capacity issues. In other words, there is only so many flights and so many ATM workers that can guide so many airplanes at the same time at the same airport. However, the SES2+ proposal does not come up with a positive solution to increase the number of staff providing air traffic service or capacity. Quite the contrary, as it focuses on cost reduction, which will inevitably negatively impact staff and, in turn, capacity.

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Flying at different altitudes and speed | Another example can be aircraft that fly in different altitudes, with a different speed, burning different amount of fuels. This is a choice the airspace users have as they file flight plans and flight routes. There are no incentives at present to fly the most environmentally friendly way possible. Hence flight plans are based on economic grounds rather than on environmental ones at present. Needless to say, the SES2+ does not come up with any change to this, and it remains up to the airspace users to choose their flight paths and whether fuel consumption is their top priority instead of punctuality.

These are only some of the examples of how environmental improvements would be great in theory but are not going to happen in practice, and certainly not thanks to the SES2+. While some of the examples outline that solutions for more efficient and less emitting aviation do exist, it is clear that improvements cannot be made unilaterally at the level of air navigation services. “Achieving a reduction of up to 10% requires different tools, policy measures and the full collaboration of the various involved stakeholders,” the Eurocontrol study reads. Furthermore, it is worth mentioning that it is not only through operational improvements in the ATM system that aviation can get more sustainable. Quite the contrary - the European ATM is already very efficient, while other areas offer a bigger room for improvement, notably through technological changes and sustainable aviation fuels, both of which potentially can have a much larger positive impact on the aviation environmental track record.

Resisting over-simplification and unrealistic expectations | The European air traffic management remains a highly complex system. It is not helpful to oversimplify the debate and present the SES2+ as the tool that will miraculously improve aviation environmental track record. While we acknowledge that fuel efficiency improvements, even if limited, are possible through a slightly changed air traffic management, the proposed SES2+ is not addressing any of the issues causing the current ATM inefficiencies. The discourse the European Commission sets around SES2+ suggests they do so for pragmatic reasons - to ensure an easy buy-in from you, the Members of the European Parliament, and the public at large. However, it is not the right approach nor the right time to mislead the public and set up false expectations and objectives that clearly cannot and will not be achieved.

While we do recognise the climate emergency Europe finds itself in, we would like to invite you to be cautious in the debates around the ATM reform and reject the SES2+ greenwashing. We agree there are ways for the aviation sector to improve its infamous environmental track record, but we are concerned about the direction the SES2+ debate has taken. Right now, we need to focus on rectifying the Commission’s SES2+ proposal in order to prevent the destruction of the ATM system it is about to introduce. The risk is that the European ATM system may otherwise become unsustainable, unstable, low cost, low quality and fragmented.

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We believe the SES2+ debate should centre on the core of the proposal, which is liberalisation and cost-reduction and all that these entail. The fundamental question we should be asking ourselves is what the purpose of the European air traffic management is, and we can take it from there.

For further thoughts about the SES2+ we would like to encourage you to consult our [ETF position paper on SES2+](#).

We remain at your disposal for any further exchange you may wish to have with us.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Eoin Coates', with a stylized flourish at the end.

Eoin COATES
ETF Head of Aviation