Re: Implementation of the EU Digital COVID Certificate and the smooth restarting of air travel

Dear EU heads of State and government,

Further to our 21 April letter (see Annex), we are coming back to you as trade associations representing Europe's airlines and airports ahead of the start of application on 1 July of the EU Digital COVID Certificate Regulation (*Regulation (EU) 2021/953 on a framework for the issuance, verification and acceptance of interoperable COVID-19 vaccination, test and recovery certificates (EU Digital COVID Certificate) to facilitate free movement during the COVID-19 pandemic*).

We have supported this proposal since its publication as we consider that a common and interoperable EU Digital COVID Certificate (DCC) is an essential tool for restoring free movement of European citizens within the EU/EEA and Switzerland, along with an effective and coordinated lifting of restrictions for intra-EU travel[1]. We welcome the good cooperation with industry that has been set up in some Member States and stand ready to continue supporting national authorities in their endeavour.

European aviation remains one of the sectors hardest hit by the pandemic. According to the latest EUROCONTROL forecast, aviation is not expected to make a full recovery before 2024[2]. Passenger traffic across the EU/EEA/Swiss airport network was still down by -77%[3] in early June compared to pre-pandemic levels. Similarly, the recovery in air connectivity is proceeding at a slow pace, with over 5,600 air routes[4] lost this month compared to June 2019.

With the peak summer travel season upon us, the EU thankfully now has a number of tools and measures available to enable and support the restarting of air connectivity, alongside travel and tourism. We need Member States to urgently implement these tools in a harmonised and effective manner. In particular, the DCC must be fully and seamlessly integrated in the passenger journey - with its verification taking place well in advance of departure and ahead of passengers arriving at the airport (*'off airport'*), together with Passenger Locator Forms (PLFs) and without duplication of checks.

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[1] As per Council Recommendation of 14.06.2021 amending Council Recommendation (EU) 2020/1475 of 13 October 2020 on a coordinated approach to the restriction of free movement in response to the COVID-19 pandemic.
[2] Source: EUROCONTROL
[3] Source: ACI EUROPE
[4] Source: ACI EUROPE & OAG

We view these as essential prerequisites to travel, to avoid long passenger queues and waiting times which would create new health hazards and inevitably result in operational issues for airports and airlines. As passenger traffic increases in the coming weeks, the risk of chaos at European airports is real. Both airports and airlines have warned about this in the last weeks[5].

While preparations for the implementation of the DCC are well underway at national level, the initial overview of the way in which such implementation is proceeding across the EU has revealed a worrying patchwork of approaches and solutions being developed – which would result in the above-mentioned essential prerequisites not being met.

A high level of fragmentation and differences in the implementation of the DCC combined with a lack of full and effective integration in the passenger journey -- as well as continued duplication of document checks in several States is alarming. It compromises the success of this summer's air travel restart and will undermine restoration of free movement across the EU.

Ahead of the coordination meeting with Member States being convened tomorrow by the European Commission to address these issues -- and to help ensure a smooth and safe experience for passengers, we therefore urge all Member States to:

- Ensure that the DCC verification can be conducted digitally before passengers arrive at the airport, to limit operational disruptions – in line with the latest EASA-ECDC Aviation Health Safety Protocol (AHSP) guidelines[6].

- Ensure that the remaining DCC verification taking place at airports - for holders of paper DCC, for instance – can be conducted using one single verifier app.

- Develop a state portal to facilitate DCC verification directly by national authorities and limit health data processing by airlines. This online verification – when done off-airport through the state portal – should result in a standard signal such as a QR code provided by the passenger to the airline to facilitate the issuance of the online boarding pass.

- Ensure that the state portal for DCC verification also integrates the verification of the PLF form, ideally using the EU Digital Passenger Locator Form (dPLF) allowing the seat number to be provided after check-in.

- Ensure that the remaining DCC verification taking place at airports for holders of paper DCCs can be conducted using one single verifier app.

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[5] www.aci-europe.org/press-release/320-airports-send-stark-warning-over-potential-summer-chaos-due-to-covid-19-checks.html
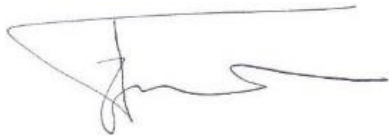[6] https://www.ecdc.europa.eu/sites/default/files/documents/Joint%20EASA-ECDC-Aviation-Health-Safety-Protocol-issue-3-17-June-2021.pdf – published 17.06

- Refrain from requesting DCC verification on arrival, as it would *"serve little medical purpose, and could lead to unnecessary queuing"* – as recognised in the EASA-ECDC AHSP.

As vaccination rates continue to increase throughout Europe and the epidemiological situation further improves, we expect Member States to adopt a full risk-based approach and lift travel restrictions in a coordinated manner. The smooth implementation of the DCC and the restoration of freedom of movement are crucially important for restoring passenger confidence and to help our sector's recovery.

We remain at your disposal for any further information and look forward to your feedback.

Yours sincerely,

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About A4E (Airlines for Europe)
Launched in 2016, Airlines for Europe (A4E) is Europe's largest airline association, based in Brussels. The organisation advocates on behalf of its members to help shape EU aviation policy to the benefit of consumers, ensuring a continued safe and competitive air transport market. With more than 720 million passengers carried in 2019, A4E members account for more than 70 per cent of the continent's journeys, operating more than 3,000 aircraft and

generating more than EUR 130 billion in annual turnover. Members with air cargo and mail activities transport more than 5 million tons of goods each year to more than 360 destinations either by freighters or passenger aircraft. Follow us on Twitter @A4Europe.

About ACI EUROPE (Airports Council International)
ACI EUROPE is 'the Voice of Europe's airports', representing more than 500 airports in 46 countries. ACI EUROPE's members account for over 90% of commercial air traffic in Europe, welcoming 2.4 billion passengers and handling 21.2 million tons of freight. ACI EUROPE's member airports committed in 2019 to achieve Net Zero CO_2 emissions for operations under their control by 2050.

About European Regions Airline Association (ERA)
Founded in 1980, European Regions Airline Association (ERA) is a non-profit trade association representing over 60 airlines and around 150 companies involved in European air transport and is the only association representing the entire spectrum of companies involved in European aviation. The association promotes the interests of European airlines by lobbying European regulatory bodies on policy matters, promoting the social and economic importance of air transport and its environmental commitments.

About IATA (International Air Transport Association)
The International Air Transport Association (IATA) is the trade association for the world's airlines, representing some 290 airlines or 82% of total air traffic. We support many areas of aviation activity and help formulate industry policy on critical aviation issues.

Annex.