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SAMFERDSELSDEPARTEMENT**

*Ministry of Transport and Communications*

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***«Single European Sky. Delivering the future: Vision 20XX»***

Thank you for the invitation and the opportunity to comment on the important subject of delivering the Single European Sky. As I am sure most of you are familiar with, Norway is fully committed to the internal market through the EEA Agreement and as a consequence subscribes fully to the objectives for the Single European Sky initiative. All steps are taken to apply the EU-legislation including the implementation of the performance scheme.

Norway has, together with Finland, Estonia and Latvia, established a Functional Airspace Block with appropriate governance arrangements at all three levels: State, Supervisory authorities and Air Navigation Service Providers. In addition intra FAB cooperation is pursued in particular between NEFAB and the Danish-Swedish FAB, aiming at achieving even greater performance improvements through joint efforts for a possible consolidation of the two FABs when a comparable level of ambition regarding the achievements to be realised is reached.

Norway stays firm in support for the Single European Sky high level objectives and this also dictates our ambitions and goals for the cooperation within NEFAB and in relation to other FABs. We believe that the established performance scheme is the right way forward to inspire and incentivise Air Navigation Service Providers to implement the most appropriate business decisions to most effectively - and without micro-managing - deal with the challenges of capacity, cost-efficiency, environment and safety. The FABs and inter-FAB relations should more than anything be pursued by Air Navigation Service Providers to allow for step-by-step improvements. As such the proposal of the Commission to redefine the objectives of the FABs is welcome.

We acknowledge the benchmark with the US as a starting point for the comparison as to the feasibility of achieving the objectives of the Single European Sky. However we must take into account the European states' sovereign and legitimate interests for maintaining capabilities for national security and defence purposes.

The major challenge for us all is still that of delivering on the political objectives of the Single European Sky by jointly subscribing to ambitious, yet realistic performance targets as part of the regulatory process for defining and approving these targets. Political determination to be sufficiently ambitious while being conscious of and managing the potential effects will be crucial for the credibility of Europe being able to deliver the Single European Sky. In particular we should allow appropriate consideration and adjustment to take account of traffic evolution (mostly negative growth). Discussions the next months on performance targets for the next reference period (2015-2019) will put the existing regulatory system and us all to the test.

In addition we need to acknowledge the fact that there should be room for national and regional differences in the contribution to achieving acceptable performance improvements for Europe as a whole, which seem to entail that some would need to contribute more than others or else our collective efforts will fall short of the targets. Emphasis therefore needs to be imposed at the national and regional/ FAB level based on concrete assessment of the potentials for performance improvements.

We recognise the potential efficiencies that can be obtained by focussing on the support services in ATM. These services are already today not protected by designation allowing for reorganisation to support and contribute to the performance objectives. We recognise that so far “competition” to provide these services is limited as they mostly remain bundled within the organisation designated for Air Traffic Services and cooperation arrangements between existing providers with regard to the supporting services are slow to materialise. Still we would like to point out the cooperation initiative among the nordic-baltic meteorological service providers organised under a consortium which should allow for optimisation and efficiencies in accordance with the expectations of the high level goals for the Single European Sky. We are uncertain of the additional benefits to insist on organisational separation for support services from the Air Traffic Service Providers. It would seem sufficient to introduce competition for the market through a tendering process based on equitable, non-discriminatory and transparent conditions.

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