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Copy to Mr Filip Cornelis Director Aviation DG MOVE
Copy to Permanent Representations to the EU

30 March 2020

COVID-19: Call on the Commission to address additional issues regarding air freight transport

Dear Mr Hololei,

Let me first thank you and your colleagues in DG MOVE for all the energy you are deploying to support companies and citizens during this COVID-19 crisis. We are, as CLECAT, seeking to support our members, freight forwarders, logistics service providers and customs agents, in all modes of transport. At this moment in time, they are all mobilised to ensure the flow of freight keeps moving to reach European citizens by all modes of transport.

CLECAT is equally thankful for the swift initiative of the Commission in issuing the guidance document to ensure essential freight keeps moving by air. The outbreak of COVID-19 is threatening the functioning of air cargo transport, which in turn affects the entire EU economy due to disruptions to the supply chain. It is crucial that the security of supplies and the integrity of the logistics chains in the EU are preserved in the interest of EU citizens and the EU economy.

Whereas we commend the guidance document on facilitating air cargo operations during the COVID-19 crisis, we would like to bring some additional issues to your attention, following exchanges and comments from our members. We realise that these are mostly directed to Member States for further action.

- **Passenger aircrafts being used for cargo-only flights:** CLECAT highly welcomes the recommendation of the European Commission to facilitate the use of passenger aircraft for cargo-only operations. This exceptional situation requires groundhandling staff to carry out their operations in a different way than usual, i.e. requiring them to load cargo into the passenger area of passenger-aircrafts in addition to the cargo loaded in the belly of the plane. In light of this exceptional situation, CLECAT would hope that the unions support the flexibility needed in the work of groundhandlers, whilst respecting health, safety and security regulations.

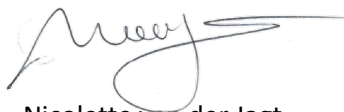
Considering that passenger aircrafts are being increasingly utilised for cargo-only operations, i.e. also on the passenger-seat level, CLECAT calls on Member States to ensure that contact

between the groundhandling crew, which has to enter the passenger-area to handle the cargo, and the aircraft crew should be avoided at all costs. In this regard, social distancing requirements, as well as the use of personal protective equipment (PPE), including masks and gloves, should be ensured at all times to reduce the possibility for infection.

- **ACC3 Status of Airlines:** CLECAT believes that it is of utmost importance to keep up the security standards in aviation in accordance with EU Regulation 300/2008 during this crisis. In light of the current situation, some airlines are applying for ACC3 status to offer ad-hoc charter flights. CLECAT therefore believes that EU Member States should process ACC3 requests expeditiously, while respecting the EU aviation security rules to the full extent.
- **Road Feeder Personnel:** CLECAT highly welcomes the Commission's recommendation regarding personnel, which includes, *inter alia*, aircrew, cargo personnel and airport personnel working on the ramp. CLECAT would like to stress that also the road feeder personnel that is involved in air transport should be considered under the same recommendation. The exemptions for personnel should therefore also apply to road feeder personnel when air cargo is trucked. For your information, CLECAT has also issued recommendations for loading and unloading cargo which could be considered in this regard.
- **Import and movement of protective equipment:** Currently, economic operators are confronted with different rules and procedures of local authorities regarding the import and movement of personal protective equipment (PPE), including masks and gloves. Some Member States are confiscating the equipment or are intending to do so, leading to a potential lack of PPE for the private sector which requires the equipment just as much as the authorities. Other Member States do not confiscate but place certain restrictions on the goods, while several Member States have no specific rules at all. To ensure that PPE is received speedily and in an efficient manner at the place where it is needed for both authorities and the private sector alike, CLECAT calls for harmonised Guidelines on the import of PPE, as well as the coordination of all relevant EU authorities on this matter, during the COVID-19 crisis

CLECAT highly appreciates the proactive and speedy response of the European Commission to the challenges resulting from the COVID-19 crisis and hopes that the recommendation related to air transport made above will be taken into account in order to ensure the continuous flow of essential goods.

Best regards,



Nicolette van der Jagt
Director General

CLECAT represents the interest of thousands of companies in the Freight Forwarding, Logistics Services and Customs Services. Multinational, medium and smaller sized companies all fall within its Membership. Together, the members of CLECAT are responsible for handling 95% of all air cargo and are, as such, the vital link between exporters/importers of goods and transport operators, such as air carriers.