



Mr. Raúl Medina Caballero
Director General
Dirección General de Aviación Civil
Ministerio de Transportes, Movilidad y Agenda Urbana
Paseo de la Castellana, 67
28071 Madrid
SPAIN

Mr. Javier Marín San Andrés
Director General de Aeropuertos
AENA
Calle Peonías, 12
28042 Madrid
SPAIN

18th March 2022

Dear Mr. Medina,

Dear Mr. Marín,

On behalf of the European Business Aviation Association (EBAA), the European branch of the International Council of Aircraft Owners and Pilots Associations (IAOPA), the General Aviation Manufacturers Association (GAMA), the Aircraft Owners and Pilots Association of Spain (AOPA-Spain), the Spanish Business Aviation Association (SPBAA), as well as the most affected aircraft manufacturers Daher Aircraft, Diamond Aircraft, Pilatus Aircraft and Piper Aircraft, we would like to express our deepest concern with regard to the publication of the new [AIP AD 2-LEBL 1](#), due to enter into force on 24th March 2022. The new AIP, regrettably, foresees the closure of Barcelona Airport to all single-engine turboprop powered aircraft and all aircraft with maximum take-off weight below 2.000 kg.

The undersigned organisations, representing the aircraft manufacturers, business aviation operators and private aircraft owners, are deeply concerned by this prohibition of access to one of Europe's leading airports, and by consequence to the premier business and tourism destination of the city and region of Barcelona. The affected aircraft types such as the Daher TBM 940, Diamond DA50, Kodiak 100, Pilatus PC-12 and Piper M600 comprise the most modern, efficient, low-emission and reliable aircraft designs in the market today. Prohibiting their access to Barcelona airport will force travellers to use larger, heavier and thus higher emission jet aircraft. This would seem contrary to the European Union and Spain's ambitions to meet our collective climate change goals as laid out in the EU Green Deal and Spain's recent signature of the COP26 Declaration on International Aviation Climate Change Ambition¹.

General Aviation and Business Aviation aircraft, such as those restricted in this AIP update, perform an important role in time-critical mobility of both people and cargo, which has become even more evident during the recent pandemic, ensuring connectivity when commercial airline schedules have been restricted. The decision reflected in the AIP therefore appears to be in contradiction with Spain's interests and objectives of guaranteeing accessibility to the Spanish airport infrastructure network managed by AENA.

¹ <https://ukcop26.org/cop-26-declaration-international-aviation-climate-ambition-coalition/>



The additional consequence of these new restrictions would be to force the affected aircraft operators to use alternative local airports, such as LELL/Sabadell, which do not have instrument approach capabilities, and thus would increase the safety risk of such operations in adverse weather conditions or at night.

It certainly is in the interests of all aircraft operators active at LEBL to ensure the safe and efficient operation of the airport and its airspace. Therefore, if there are specific concerns that the airport has about the operation of these aircraft types, we would greatly welcome the opportunity to discuss alternative mitigating actions that operators can take to enable their continued access to the airport.

We therefore urgently request that AENA delay the entry into force of the proposed AIP provision. This would allow for us to meet personally, to directly discuss concerns about the operation of these aircraft and identify potential alternative mitigating actions that might be most appropriate to implement at Barcelona Airport.

We look forward to your response, and the proposal for an appropriate date for our meeting.

Sincerely,

Carlos Martí
President

Aircraft Owners and Pilots
Association – Spain

Nicolas Chabbert
Senior Vice President, Aircraft
Division
DAHER

Liqun (Frank) Zhang
Chief Executive Officer
Diamond Aircraft

Athar Husain Khan
Secretary-General
European Business Aviation
Association (EBAA)

Pete Bunce
President & CEO
General Aviation Manufacturers
Association (GAMA)

Dr. Michael Erb
Senior Vice President - Europe
International Aircraft Owners and
Pilots Association (IAOPA)

Ignaz Gretener
Vice President General Aviation
Pilatus Aircraft

John Calcagno
President & CEO
Piper Aircraft Inc.

Jose Luis Garcia
President
Spanish Business Aviation
Association (SpBAA)

CC: Ms. Sonia Corrochano, Director – Aeropuerto Josep Tarradellas Barcelona - El Prat