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Member of the European Commission  
Home Affairs

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Dear Chairman,

We would like to congratulate the Dutch Safety Board for the publication of the report “Safe flight routes: responses to escalating conflicts”. As highlighted in the report the international aviation community is facing increasing threats from armed conflicts in many regions around the world, either through transit over airspaces or airports near conflict zones. Conflict zones continue to pose a serious risk to civil aviation both in terms of deliberate and unintentional threat. Downing of the Ukraine International Airlines Flight 752 (PS752) at the Tehran Imam Khomeini International Airport is a tragic evidence of those risks.

In this regard, we welcome the report as an important contribution to enhance the capacity of airlines, States and the international aviation community as a whole to properly manage the risks of flying over conflict zones. We are grateful that our earlier comments and drafting suggestions were taken into account by the Board when finalising the report.

As referred in the report, since the downing of MH-17, through a cooperation between Member States relevant authorities, European institutions (in particular Commission and the EU Intelligence and Situation Centre), the European Union Aviation Safety Agency (EASA), a Conflict Zone Alerting System was set-up at the European level. The aim was to share information on the assessment of risks arising from conflict zones in a timely manner. Common risk assessments take place on a regular basis under the lead of the Integrated EU Aviation Security Risk Assessment Group. The process has been further fine-tuned by associating airlines associations and European airlines to the preparatory works of the Group.

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At the international level at the International Civil Aviation Organization (ICAO) and thanks to the efforts in particular of the Netherlands and the European group, progress has been made in the relevant Standards And Recommended Practices (SARPS). As the EU, we have fully supported these efforts, and incorporated the information sharing elements of Amendment-17 to Annex-17 into the EU AVSEC legislative acquis. The EU Conflict Zone Alerting System is also referenced as a best practice in ICAO Guidance material (Doc 10084 entitled “Risk Assessment Manual for Civil aircraft Operations Over or Near Conflict Zones, Second Edition, 2018).

While the EU conflict zone risk assessment process has proven to be an effective instrument in providing a basis for consistency of mitigation measures, within the framework of the Integrated EU Aviation Security Risk Assessment Group, the Commission has recently launched reflections with Member States represented in the group and EASA on how to further streamline the conflict zones risk assessment process. These will notably focus on: a) better defining rules governing the issuance of EASA Conflict Zones Information Bulletins (CZIBs) and EASA information notes ; b) better defining working arrangements, including deadlines for consultation of CZIBs and information notes, under both normal and urgent circumstances ; c) facilitating the dissemination of EASA information notes to relevant parties, including airlines, through their publication in the EASA conflict zones information sharing platform ; d) enabling the possibility to deviate from general rules and task EASA to issue CZIBs or information notes in case of urgency and in the impossibility to carry out a proper risk assessment.

Timely publication and dissemination of recommendations through CZIBs or information notes is critical and we are confident that the adjustments will address the observations of the Dutch Safety Board as far as the conflict zone risk assessment process is concerned, as such contributing to enhance the efficiency and the effectiveness of the European integrated aviation security risk assessment process and the operational needs of interested parties.

Our respective services are at your disposal for any further clarification.

Yours sincerely,



Ylva JOHANSSON



Adina VĂLEAN

Cc: Monique PARIAT (DG HOME), Henrik HOLOLEI (DG MOVE), Patrick KY (EASA)