



IATA Comments on Draft Bill 20401 on Regulations for Old Aircraft

The International Air Transport Association (IATA) is a global trade association for airlines representing some 290 airline members and accounting for 82% of total global air traffic. Our members include Asiana Airlines, Eastar Jet, Jeju Air, Jin Air, Korean Air, T'way Air and major foreign airlines that operate services to/from the Republic of Korea.

IATA understands that the National Assembly of the Republic of Korea is currently seeking public opinion on a draft bill on regulations for old aircraft, defined as those of over 20 years of age. As such, IATA would like to submit the below comments to the National Assembly of the Republic of Korea for your kind consideration.

Ensuring that air travel remains a safe, secure and efficient mode of transport is a common objective for governments, aircraft operators and passengers. In this regard, IATA recognizes the importance of aviation safety and it is a top priority for both IATA and our member airlines.

In line with IATA's comments on draft bill 19331 on aircraft history management previously submitted to the Republic of Korea National Assembly on 29 March 2019 (see [Annex A](#)), IATA wishes to reiterate that there is no direct correlation between the age of an aircraft and safety. Therefore, IATA is of the opinion that additional requirements for aircraft of over 20 years of age, including the submission of additional information by airlines for such aircraft, are unlikely to contribute positively to the enhancement of aviation safety. Given the likely limited benefits of these requirements, the compliance burden on airlines would increase disproportionately. More importantly, IATA wishes to highlight that the multiple regulations proposed which are specific to aircraft of over 20 years of age, including the aforementioned draft bill 19331 and the amendment of Article 317 of the Enforcement Rule of the Aviation Safety Act, could lead to the mistaken and unjustified conclusion that there are additional concerns about the safety of such aircraft.

Therefore, IATA would like to state our opposition to the proposal to impose additional requirements for aircraft of over 20 years of age, including the submission of additional information by airlines for such aircraft. IATA would be happy to support the National Assembly of the Republic of Korea and the Ministry of Land, Infrastructure and Transport in your efforts to enhance aviation safety in the Republic of Korea.

Annex A: IATA Comments on Draft Bill 19331 on Aircraft History Management

(Submitted to the Republic of Korea National Assembly on 29 March 2019)

The International Air Transport Association (IATA) is a global trade association for airlines representing some 290 airline members and accounting for 82% of total global air traffic. Our members include Asiana Airlines, Eastar Jet, Jeju Air, Jin Air, Korean Air, T'way Air and major foreign airlines that operate services to/from the Republic of Korea.

IATA understands that the National Assembly of the Republic of Korea is currently seeking public opinion on a draft bill on the management of aircraft history by airlines. Due to the time constraint, IATA was unable to consult our member airlines extensively on the proposed bill. However, IATA would like to submit the below comments to the National Assembly of the Republic of Korea for your kind consideration.

Ensuring that air travel remains a safe, secure and efficient mode of transport is a common objective for governments, aircraft operators and passengers. In this regard, IATA recognizes the importance of aviation safety and it is a top priority for both IATA and our member airlines. However, IATA is of the opinion that the requirement for airlines to publish aircraft history is unlikely to contribute positively to the enhancement of aviation safety. Given the likely limited benefits of these requirements, the compliance burden on airlines would increase disproportionately, particularly as requirements such as the provision of aircraft history for pre-owned aircraft would be difficult to comply with. More importantly, the requirements could bring about unintended consequences, by giving an impression that there is a direct correlation between the age of an aircraft and safety, which is incorrect and unjustified.

As such, IATA would like to respectfully request the National Assembly of the Republic of Korea to reconsider the proposal to require airlines to publish the history of the aircraft they operate on their website. IATA would be happy to support the National Assembly of the Republic of Korea and the Ministry of Land, Infrastructure and Transport in your efforts to enhance aviation safety in the Republic of Korea.