Mr. Jürgen Köppen Head of Delegation Delegation of the European Commission to Hungary Bérc utca 23. 1016 Budapest

Dear Mr. Jürgen Köppen,

We would like to underline the negative impacts of the proposed construction of the Győr-Pér regional airport. As T&E (European Federation for Transport and Environment) states, "aviation contributes 12% of the global CO2 transport emissions. With a business as usual policy, emissions are expected to triple over the next 15 years, as compared to 1990. These predictions for future emissions of the aviation sector are not in line with sustainable development."

The environmental effects of aviation are complex. At the local level millions of citizens are affected not only by gaseous emissions but also by noise. Another big problem is the external safety of citizens around airports. Air transport gives rise to a variety of emissions such as:

- CO₂, which contributes to the greenhouse effect by preventing the Earth from radiating its heat into space,
- NO_v, which depletes the ozone layer, causes acidification, damages health and also contributes to the greenhouse effect,
- SO₂, which is also responsible for acidification and other environmental and health damages
- Particulate matter containing a highly toxic substances.

Comparing aviation with other modes of transport, it is evident that per passenger- or tonne-kilometre, aviation causes much higher emissions. The harmful environmental effects of aviation are multiplied in case of airports where various emissions and noise are concentrated as a result of the many take-offs and landings.

The construction of the Győr-Pér regional airport is promoted first of all by the company Audi which would benefit most from it, because of the direct air connection to its headquarters in Ingolstadt, Germany. Audi is one of the biggest beneficiaries of tax and custom allowances in Hungary, thus receiving enormous hidden subsidies, though its activity as a car manufacturer is highly polluting. The 2001 EU Regular Report on Hungary's progress towards accession underlines that "An immediate alignment is necessary of these fiscal aid schemes, under which some benefits last until 2011. Hungary needs to ensure that tax benefits, including aid to the so-called sensitive sectors, are compatible with the *acquis*."

In our opinion it is unacceptable that the health of local residents and the serious impact on the environment are neglected, and the interest of an industrial lobby is given priority. The approved construction of the Győr-Pér regional airport ignores not only the environmental and health aspects but also the fiscal considerations relating to the national economy. The construction as well as the operation would be financed mostly from the taxpayers' money, while the beneficiaries would be mostly a few private companies. As far as we know, no civil organisation was involved in the planning of the airport project and there was no public participation in the environmental impact assessment project, and therefore the construction of the airport would contradict Hungarian as well as EU laws.

According to our information, 55% of the construction costs of the Győr-Pér regional airport will be financed by Phare CBC contribution. Such use of a Phare aid is not in line with the Presidency Conclusions of the Göteborg European Council (June, 2001), which states the following:

"A sustainable transport policy should tackle rising volumes of traffic and levels of congestion, noise and pollution and encourage the use of environment-friendly modes of transport as well as full internalisation of social and environmental costs."

We hope that, despite that the project is already approved the EU, will refuse to subsidise in Hungary the environmentally most damaging transport mode. We are looking forward to your reply on this issue as soon as possible.

Yours sincerely,

András Lukács President Clean Air Action Group