

API 2020 Briefing Paper No. 02

ASEAN Integration Through the Skies: The Current Progress in Preparation for 2025

I. Introduction

The International Air Transport Association (IATA) projected that the Asia Pacific region will provide more than half of the new passenger traffic until 2035 with a market size of 3.1 billion people.¹ IATA also projected that two of the five fastest-growing global markets in terms of additional passengers per-annum are from Association of South East Asian Nations (ASEAN), namely Indonesia (ranked 4th - 135 million new passengers for a total of 242 million) and Vietnam (ranked 5th - 112 million new passengers for a total of 150 million).²

In that context, further integration of aviation within ASEAN has a significant potential to integrate the people and economy of a region of 650 million people. To achieve this goal, the ASEAN Economic Blueprint 2025³ encourages regional economic growth through air connectivity. However further steps to achieve this vision have yet to be taken. Specifically, the establishment of an ASEAN Community Carrier, together with a brand new ASEAN aviation guideline, could kickstart further

integration efforts. A consolidation effort will also strengthen ASEAN Member States airlines in competing with other bigger and competitive airlines, such as Chinese carriers in a world where an ASEAN-China aviation agreement⁴ has taken place. At the same time, these policies could improve competition within the regional market, thus benefitting ASEAN passengers.

In the midst of the Covid-19 pandemic, aviation services face an existential crisis. In that context, consolidation through liberalisation can play a role in ensuring the survival and the sustainability of the aviation industry in ASEAN.

This paper will analyse ASEAN integration through seamless air connectivity including a brief analysis on the impact of the Covid-19 pandemic. The plausibility of ASEAN Community Carrier establishment shall be compared with the European Union (EU) aviation policy and the lessons learned from the latter. Finally, this paper ends with policy recommendations amidst the ASEAN Way, as well as the current liberalisation stage in ASEAN.

¹ The forecast was issued prior to Covid-19 pandemic. https://www.iata.org/en/about/worldwide/asia_pacific/Asia-Pacific-20-Year-Forecast/ accessed on 15 September 2020.

² Ibid.

³ The ASEAN Economic Community Blueprint 2025 was adopted by ASEAN Leaders at the 27th ASEAN Summit on 22 November

2015 in Kuala Lumpur, Malaysia.

⁴ Air Transport Agreement between the Governments of the Member States of the Association of Southeast Asian Nations and the Government of the People's Republic of China. Fifth Freedom traffic rights between China and all ASEAN Member States have taken place since 2019.

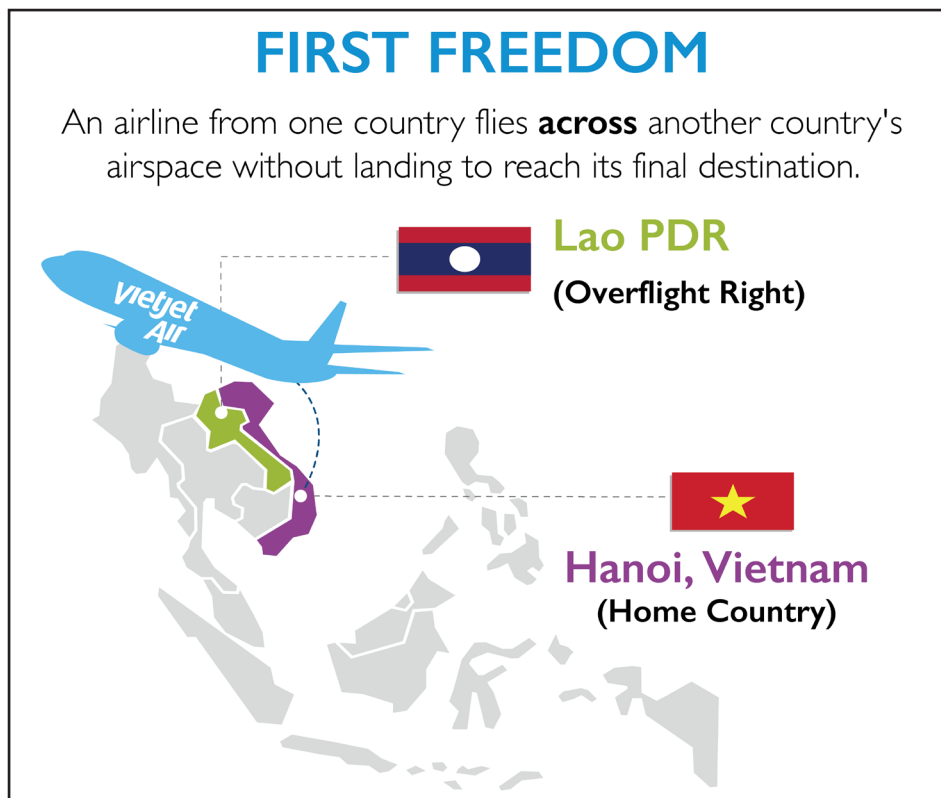
2. ASEAN Single Aviation Market: The State of Play

The month of October 2020 marks almost five years since the full enactment of the ASEAN Single Aviation Market. Also known as ASEAN Open Skies, this policy consists of three multilateral agreements, namely i.) ASEAN Multilateral Agreement on the Full Liberalisation of Air Freight Services; ii.) ASEAN Multilateral Agreement on Air Services; and iii.) ASEAN Multilateral Agreement on the Full Liberalisation of Passenger Air Services. These

agreements aim to strengthen ASEAN integration through increasing intra-ASEAN connectivity.

In April 2016, Indonesia and Lao PDR became the latest ASEAN Member States to ratify the ASEAN Multilateral Agreement on the Full Liberalisation of Passenger Air Services which further consists of two protocols. This step means unlimited 3rd, 4th, and 5th Freedom of the Air may take place between any ASEAN cities. Both the 1st and 2nd Freedom of the Air are also included.

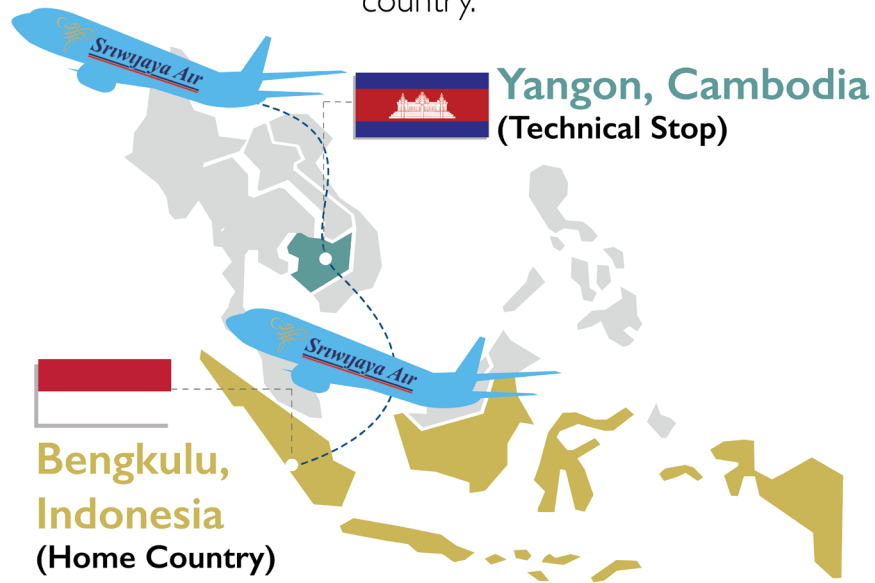
Box I – First Freedom of the Air



Box 2 – Second Freedom of the Air

SECOND FREEDOM

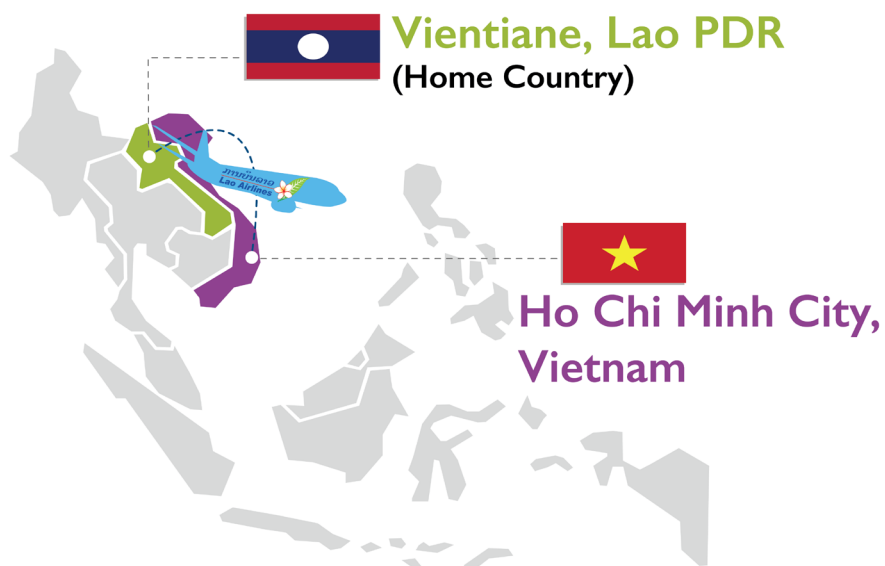
To land in another territory for non-traffic purposes. For instance, a commercial aircraft can land to refuel in another country.



Box 3 – Third Freedom of the Air

THIRD FREEDOM

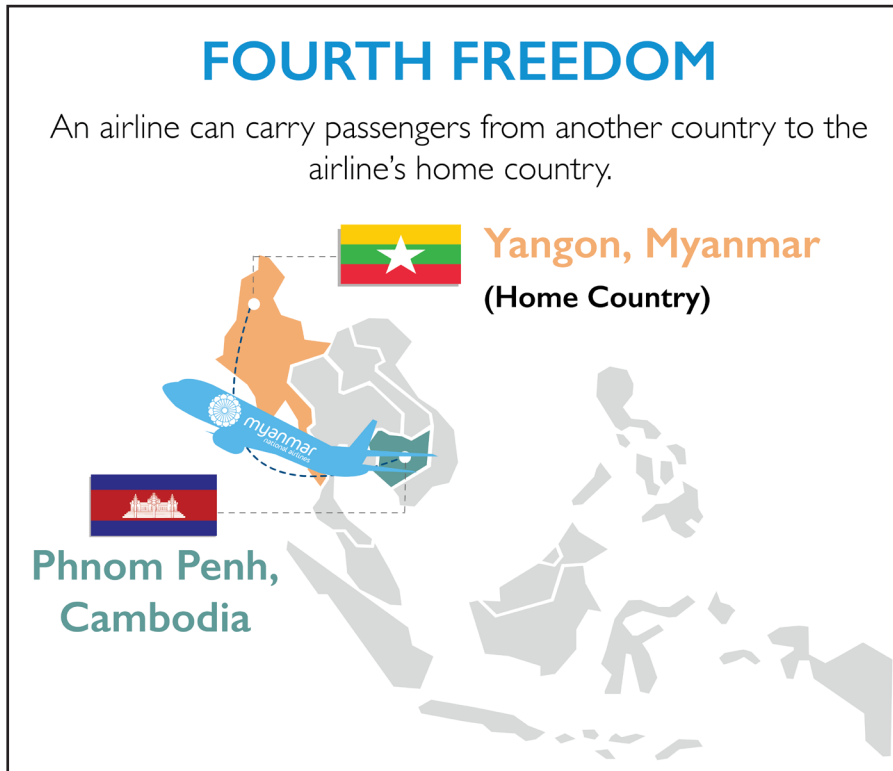
An airline can deliver passengers from the airline's home country to another country.



Box 4 – Fourth Freedom of the Air

FOURTH FREEDOM

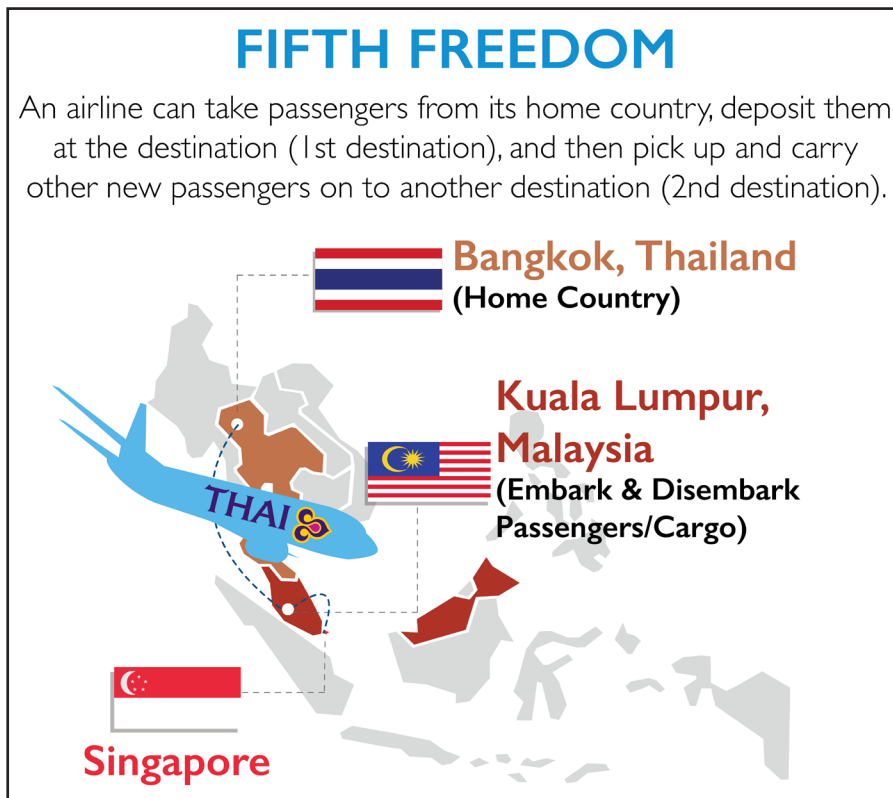
An airline can carry passengers from another country to the airline's home country.



Box 5 – Fifth Freedom of the Air

FIFTH FREEDOM

An airline can take passengers from its home country, deposit them at the destination (1st destination), and then pick up and carry other new passengers on to another destination (2nd destination).



An open skies concept means freedom of air traffic rights as well as more freedom to business practices which are normally restricted namely i.) flight frequency and capacity; ii.) fare or tariff; iii.) aircraft type; iv.) designated airline(s); and v.) route(s).⁵ As further liberalisation takes place, according to open skies concept, such points are being relaxed and airlines are let alone to determine based on their own business model.⁶ The concept of open skies was introduced for the first time in the United States to stretch the negotiation framework of Chicago Convention of 1944⁷ to its point of maximum tolerance.⁸

ASEAN Member States' Reluctance to Further Liberalisation

The implementation of the ASEAN Single Aviation Market does not amount to truly “open skies”. In regards to liberalisation of air traffic rights, ASEAN Open Skies allows only up to 5th Freedom of

the Air. ASEAN Member States with significant domestic market such as Indonesia, Malaysia, Philippines, Thailand, and rapidly growing Vietnam are reluctant to allow further liberalisation. At this stage, protecting their own national airlines is one of the main concerns. For example, Indonesia — with around 90 million domestic passengers per-annum during the last few years— shall see such number as an asset for maximizing national aviation industry growth.⁹

On the other hand, ASEAN Member States with only one international airport, namely Brunei Darussalam and Singapore, have strong grounds in favour of further air traffic rights liberalisation. They are in an advantageous situation because there is not any domestic market issue to consider. Their respective airlines will be able to maximize its sole airport as transit points in case further air traffic liberalisation - namely the 6th Freedom of the Air – is implemented.

⁵ Barry R. Diamond, “The Bermuda Agreement Revisited: A Look at the Past, Present and Future of Bilateral Air Transport Agreement”, 41(3) *Journal of Air Law and Commerce* (1975). See also Brian F. Havel, *Beyond Open Skies: A New Regime for International Aviation*, (Alphen aan den Rijn: Kluwer Law International, 2009).

⁶ Henri Wassenbergh, *External Aviation Relations of the European Community*, (Deventer: Kluwer Law and Taxation Publishers, 1992), p. 34.

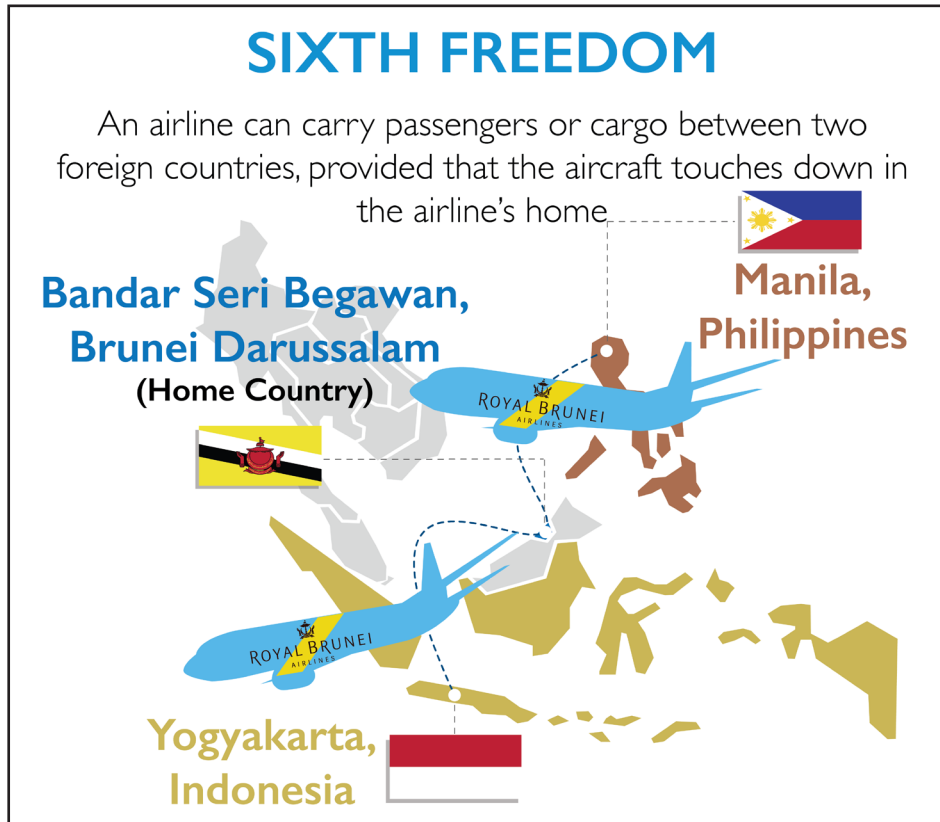
⁷ The Convention on International Civil Aviation, also known as the Chicago Convention of 1944, is the magna carta of international civil aviation. However, it remains silent on commercial issues in regards to the respective national airline(s) operations. In practice, such issues are regulated through bilateral and multilateral air service agreements.

⁸ The Bermuda I framework for bilateral air service agreements

was introduced by the United Kingdom and United States in 1946. Its modification gave birth to the Bermuda II framework in 1977. Afterwards, Open Skies concept is introduced to challenge both frameworks from liberalisation perspective. The Netherlands became the first European country to reach a landmark open skies agreement with the United States in 1992. See Pablo Mendes de Leon, “Before and After the Tenth Anniversary of the Open Skies Agreement Netherlands-US of 1992”, 27(4/5) *Air & Space Law* (2002). See also <https://www.washingtonpost.com/archive/business/1992/09/05/us-netherlands-agree-to-open-skies/2e2b26d9-c156-4ebe-9517-ea327f654062/> accessed on 5 October 2020.

⁹ Ridha Aditya Nugraha, ‘AAIP Policy Paper No. 2/2019 – Reviewing Ownership and Control of the Indonesian Airlines’ (2019) IKMAS Universiti Kebangsaan Malaysia.

Box 6 – Sixth Freedom of the Air



The success of this model can be seen in the middle east hubs. Within this decade, three well known middle east carriers, namely Emirates (Dubai-based), Etihad Airways (Abu Dhabi-based), and Qatar Airways (Doha-based), operate by maximizing the opportunity given by 6th Freedom of the Air. This is made possible by each respective States succeeding in their air diplomacy within their bilateral or multilateral air service agreements. The airports also enjoy abundant transit passengers to strengthen their global-hub status and economic growth.

However, as a result of the competing interests of ASEAN Member States, any further attempt on ASEAN Open Skies liberalisation further than 5th Freedom of the Air has not gained any room nor progress. This reflects a priority of safeguarding one ASEAN Member States airline(s) from being overrun by direct competition with other ASEAN Member States' bigger and competitive airline(s) is alive. Status quo remains, and regional growth in the aviation sector relies on this stage.

3. Non-Uniformity of Foreign Direct Investment Policy in the Member States' Airlines

Beyond freedoms of the air, the other major driver of aviation integration is the terms of ownership and control. National restrictions on ownership prevent

airlines within ASEAN from owning subsidiaries in other member states – an alternative to providing services directly via air freedoms. In regards to airline business, Foreign Direct Investment (FDI) scheme exists in all ASEAN Member States and, as of today, there is no uniformity within each national legislation when it comes to foreign ownership limitation.

Box 7 – Table 1:
Foreign Direct Investment Restrictions in Airlines within ASEAN Member States¹⁰

ASEAN Member States	Foreign Ownership Limitation
Brunei Darussalam	49% foreign ownership is allowed.
Cambodia	100% foreign ownership is allowed.
Indonesia	49% foreign ownership is allowed. Indonesian shareholders should be a single majority.
Lao PDR	100% foreign ownership is allowed. In a joint venture scheme, foreign investors shall contribute at least 10% of the total capital.
Malaysia	45% foreign ownership is allowed for Malaysian Airlines. Maximum ownership for a single foreign entity is limited to 20%. 49% foreign ownership for other airlines.
Myanmar	49% foreign ownership is allowed.
Philippines	40% foreign ownership is allowed.
Singapore	49% foreign ownership is allowed.
Thailand	49% foreign ownership is allowed.
Vietnam	One single foreign individual or legal entity's shares shall not exceed more than 34% of the airline's charter capital. In case a Vietnamese legal entity has foreign capital investment, its investment shall not exceed 49% of the airline's charter capital. One Vietnamese individual or legal entity must hold the largest portion of the airline's charter capital.

¹⁰ *Compilation of ASEAN Member States national legislations on aviation and investment. See Sufian Jusoh, 'AAIP Policy Paper No. 1/2018 - Integrating ASEAN Economy through Liberalisation*

of Investment in the Aviation Sector' (2018) IKMAS Universiti Kebangsaan Malaysia.

Beyond ownership restrictions, each ASEAN Member States' aviation law also plays a role through determining further conditions in establishing a national airline. For example, six ASEAN Member

States have set minimum aircraft in operation requirements within their respective aviation law as elaborated in Table 2.

**Box 8 – Table 2:
Conditions for Airline regarding Minimum Aircraft in Operation¹¹**

ASEAN Member States	Minimum Aircraft in Operation
Cambodia	Airline operates minimum one aircraft. No further detail on the number of aircraft owned or in possession (leasing).
Indonesia	The enactment of Omnibus Law on 5 October 2020 changes the minimum aircraft requirements. A new government regulation shall be enacted to determine the new number in the (near) future. Previously, a scheduled airline must operate a minimum of ten aircraft; with a minimum of five aircraft owned and another five aircraft in possession, for example through leasing.
Malaysia	Airline operates minimum one aircraft. No further detail on the number of aircraft owned or in possession.
Singapore	Airline operates a minimum of three aircraft. No further detail on the number of aircraft owned or in possession.
Thailand	Airline operates a minimum of two aircraft without further detail on the number of aircraft owned or in possession.
Vietnam	No further detail on the number of aircraft owned or in possession. The total aircraft in operation determine the minimum amount of capital (including equity and loan capital), as follow: up to 10 aircraft: 300 billion VND; between 11 to 30 aircraft: 600 billion VND; and more than 30 aircraft: 700 billion VND.

Such differences on foreign ownership limitation and minimum aircraft requirements set up a barrier for investment, including among ASEAN investors themselves. Airlines need to invest in each ASEAN

Member States to set-up seamless connectivity within the region. Currently, AirAsia, Lion, and VietJet are the three airline groups that have taken action in seizing the intra-ASEAN market.

¹¹ Compilation of ASEAN Member States national legislations on

aviation and investment.

These airlines notice the prospect of multiple ASEAN Member States domestic markets. At the same time, they need to establish networks among their subsidiaries to ensure maximum connectivity with only up to the 5th Freedom of the Air being

allowed. As such these three airlines are the closest to achieving the status of 'pan-ASEAN airlines'. However, they need huge capital to invest in each ASEAN Member State, so clearly not all airlines can follow this kind of costly business model.

Box 9 – Table 3: The Current 'pan-ASEAN Airlines'

Airline Group	Nationality	Subsidiaries in ASEAN Member States
AirAsia	Malaysia	The group has invested in four ASEAN Member States. AirAsia and AirAsia X (Malaysia); Indonesia AirAsia and Indonesia AirAsia X (Indonesia); Philippines AirAsia (Philippines); Thai AirAsia and Thai AirAsia X (Thailand).
Lion	Indonesia	The group has invested in three ASEAN Member States. Batik Air, Lion Air, and Wings Air (Indonesia); Lion Bizjet and Malindo Air (Malaysia); Thai Lion Air (Thailand).
VietJet	Vietnam	The group has invested in two ASEAN Member States. Thai VietJet Air (Thailand); VietJet Air (Vietnam).

Comparison with the European Union

The status quo in ASEAN results in significant costs for airlines trying to scale up within the region, which is at odds compared to the situation in the European Union (EU) where all Freedoms of the Air, including the 7th as well as both ultimate 8th and 9th Freedoms of the Air (or cabotage rights), is allowed. As a result, all EU airlines only need to put one foot in one of the EU Member States to have access the whole intra-EU market. This situation has established a level playing field among EU airlines. Furthermore, it also encourages low-fare airlines

or low-cost carriers' growth, such as EasyJet¹² and Ryanair¹³, with its point-to-point market business model.

The EU situation looks more efficient, but seems too far for ASEAN due to its nature - consisting of ten jurisdictions which means ten discretions on FDI in airline business. Furthermore, both the ultimate 8th and 9th Freedom of the Air are still deemed too disruptive for numerous ASEAN Member States, either from economic sovereignty or national security perspective.

¹² EasyJet Airline Company Limited is a British low-cost carrier headquartered in the Luton Airport, London. It operates an estimation of 330 fleets of aircraft. See EasyJet Public Limited Company Page <<http://corporate.easyjet.com>> accessed 26 September 2020.

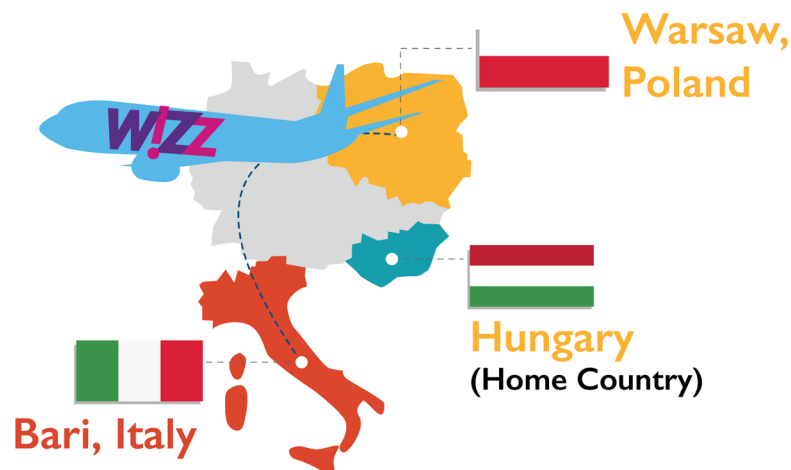
¹³ RyanAir Group, with RyanAir Holdings Public Limited Company as the parent company, is an Irish low-cost airline headquartered

in Dublin, Ireland, with its primary operational bases at Dublin and London Stansted airports. It forms the largest part of the Ryanair Holdings family of airlines, and has Ryanair UK, Ryanair DAC, Buzz, Malta Air, and Lauda as subsidiaries, and an estimated 470 aircraft in total. See the RyanAir Corporate Page <<https://corporate.ryanair.com/ryanair-facts-and-figures>> accessed 26 September 2020.

Box 10 – Seventh Freedom of the Air

SEVENTH FREEDOM

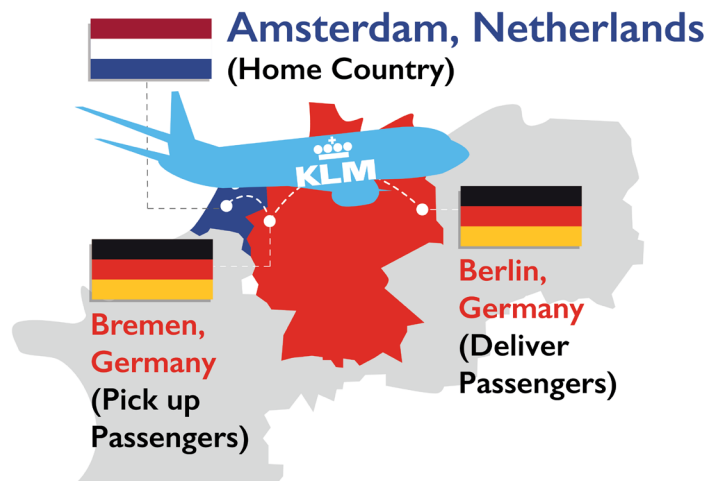
An airline can carry on flights that originate in a foreign country, bypass its home country, and deposit the passengers at another international destination.



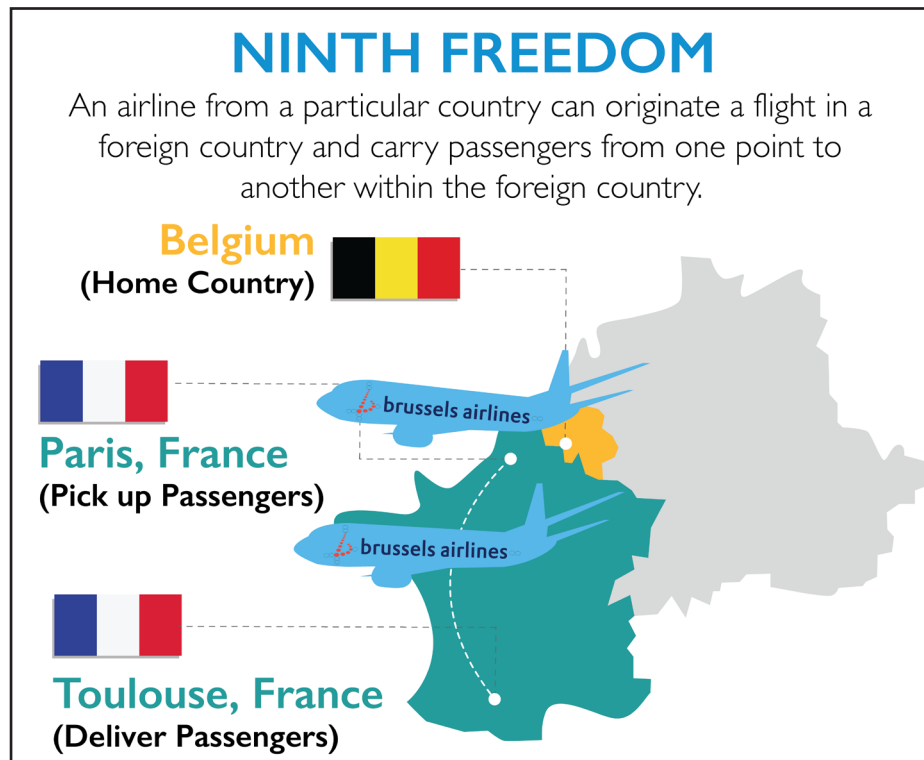
Box 11 – Eight Freedom of the Air

EIGHT FREEDOM

An airline can carry passengers from one point in a country to another point within the same country on a flight that originates in the airline's home country. This is known as cabotage and is not widely used outside of EU.



Box 12 – Ninth Freedom of the Air



4. In Search of the ASEAN Community Carrier: At Odds with Fair Competition?

As provisions regarding FDI on airlines vary among the ASEAN Member States, such non-uniformity has discouraged the establishment of a “community carrier” (i.e. an airline licensed to operate across ASEAN as a whole, in the same terms in each Member State), since substantial ownership by its own nationals is still deemed vital. As a result, it is not surprising that FDI regarding airline ownership has not changed much in the past few years.¹⁴ The status quo puts the idea of establishing an ASEAN

Community Carrier as a non-priority topic for the ASEAN Transport Ministers Meeting.

In comparison, the EU Regulation No. 1008/2008¹⁵ sets up clear conditions for establishing a community carrier. EU Member States and/or its nationals must own more than 50 % of the undertaking and effectively control the airline to be recognised as an EU community carrier. The regulations only require the ownership of one aircraft through ownership or a lease agreement.¹⁶ By fulfilling these conditions, the carrier is entitled to take advantage of the EU aviation market liberalisation.

¹⁴. See Alan Khee-jin Tan, ‘IDEAS Policy Brief No. 8 - Ownership and Control of Airlines in Southeast Asia: Prospects for an ASEAN Community Carrier’, (2017) Institute for Democracy and Economic Affairs.

¹⁵. Regulation (EC) No. 1008/2008 of 24 September 2008 on

common rules for the operation of air services in the Community.
¹⁶. Brussels, 8.6.2017 C(2017) 3711 Final Commission Notice of 8.6.2017 Interpretative Guidelines on Regulation (EC) 1008/2008 - Rules on Ownership and Control of EU Air Carriers.

Further advantage for airlines in obtaining EU Community Carrier status is the ability to receive state aid (subsidy) for starting or expanding networks. Such state aid is granted by the EU Member States. The route itself must be a regional one which links EU regional airports with less than five million passengers per annum, especially those that are located in disadvantaged regions or outermost regions in the EU. This means the European Commission assures that any state aid granted is aimed to strengthen only EU airlines and routes.¹⁷

Within the competitive legal regime, logically, state aid from EU Member States is at odds with fair competition. However, the aid is justified as long it passes the Market Economy Investor Principle test to ensure the legality of granting each state aid.¹⁸ The Court of Justice of the European Union (CJEU) shall settle any dispute on this issue, thus becoming the guardian for ensuring fair competition. When it concerns regional development, Public Service Obligation (PSO) flights serving remote and underdeveloped regions are exempted to ensure equal economic development in EU.

The establishment of an ASEAN Community Carrier represents a significant step for air connectivity. However, regulating subsidy or state aid across ASEAN Member States airlines through a regional legal framework will be challenging, and therefore not likely to be achieved for some time. Partly, this is because many ASEAN Member States subsidise only their flag carriers, leaving the other national airline(s) struggling to compete in their respective domestic market. This aviation policy is accepted and has become the status quo in the region.

Furthermore, ASEAN has its own method of operation where a non-interference principle is

upheld and respected among the Member States. This unique characteristic has led to a situation where not a single Member State can judge another's policy as wrong nor intervene, either directly or via the ASEAN institutions. Unlike in the EU, there is no ASEAN Court to guard fair competition in the aviation sector, especially related to intra-ASEAN flights. As a result, more ambitious policies, such as coordinating state aid, remain a distant prospect for ASEAN.

ASEAN Challenges to Realising Community Carrier

In this context, the main challenge is determining a realistic ASEAN Community Carrier concept. In light of the current challenges, establishing slot priority scheme for ASEAN Community Carrier, for this stage, is realistic. Under this proposal, ASEAN Member States airlines, both flag and non-flag carriers, which become community carriers would enjoy certain advantages in all airports across the region. These airlines would have the priority to obtain airport slots with the best schedule, either for business or leisure travel depending on its purpose. This scheme would also benefit ASEAN airports. This situation could foster regional economic growth through connectivity, namely faster people and goods mobility, with reference to ASEAN Economic Community Blueprint 2025.

There are two issues that need to be resolved to implement this proposal. First, how to determine the foreign ownership restrictions to define an ASEAN Community Carrier. For national defense and security – as well as pride (nostalgic reason), each ASEAN Member States could designate one of its national airlines to become the flag carrier. Noticing how this issue is sensitive for some ASEAN

¹⁷. Magnus Schmauch, *EU Law on State Aid to Airlines: Law, Economics, and Policy*, (Berlin: Lexxion Publisher, 2012), p. 295.

¹⁸. Market Economy Investor Principle is to determine whether

a public investment is a selective measure or if it would have been made by a private shareholder according to normal market economy situations.

Member States, these *de jure* flag carriers shall not be affected by any ownership liberalisation; but at the same time they shall enjoy the proposed advantage of becoming an ASEAN Community Carrier – namely owning slot priority across all ASEAN airports. However, other ASEAN Member States airlines that are not flag carriers are subject to this liberalisation scheme. It must be highlighted that as of today, there is still no definition on fair competition pertaining to intra-ASEAN flights.

Second, ASEAN needs to enact its own guideline in the aviation sector. Further details related to the ASEAN Community Carrier concept, such as i.) airport criteria for slot priority; ii.) PSO flights serving intra-ASEAN remote and underdeveloped regions or cities; and iii.) uniformity of minimum aircraft requirements for airline establishment, shall be further regulated in the future. Hopefully, the new ASEAN aviation sector guideline could become a stepping stone in establishing fair competition definition - starting from intra-ASEAN flights.

5. The Introduction of ASEAN Open Skies Protocol 4

As for the most recent legislation on ASEAN Multilateral Agreement for the Full Liberalisation of Passenger Air Services, the Fourth Protocol¹⁹ was introduced in November 2018. This protocol, which has been in force since August 2019, aims to

increase connectivity through the introduction of co-terminal rights.

Article 2 of the ASEAN Open Skies Fourth Protocol

“[t]he designated airline(s) of each Contracting Party shall be allowed to exercise co-terminal rights, provided that there shall be no exercise of cabotage rights.”²⁰

In addition to the 5th Freedom of the Air which already takes place in ASEAN, the Fourth Protocol allows ASEAN Member States airlines to carry out international traffic from their home base in a Member State (A) to more than one airport in another Member State (B1, B2); without the right to sell tickets or transport passengers solely from B1 to B2. The Fourth Protocol does not really constitute the 8th or 9th Freedom Traffic Rights (or cabotage rights), but allows domestic connections for international traffic in another ASEAN Member States.

The notion of “...shall be no exercise of cabotage rights...” means any carrier is prohibited to embark passenger within the domestic transit right. Physically the aircraft could fly between two points within one foreign country (another ASEAN Member States), but without any economic right. Thus, this legal framework breakthrough has no intention on breaking the ASEAN cabotage fortress.

¹⁹ASEAN Open Skies Protocol 4 on Co-Terminal Rights Between Points Within the Territory of Any Other ASEAN Member States. Done at Bangkok on 9 November 2018. As of April 2020, six states have ratified this protocol, namely Singapore (May 2019), Thailand (June 2019), Malaysia (August 2019), Myanmar (September 2019), Viet Nam (October 2019), and lastly the Philippines (December 2019). See ‘ASEAN Transport Instruments

and Status of Ratification (as of 28 August 2020)’ (Association of South East Asian Nations).

²⁰The term “cabotage rights” includes the holding out of air services for sale on purely domestic routes by the designated airlines(s) of that Contracting Party. For further reading on cabotage, see Pablo Mendes de Leon, *Cabotage in Air Transport Regulation*, (Dordrecht: Martinus Nijhoff, 1992).

Box 13 – ASEAN Open Skies Protocol 4



ASEAN Member States with huge domestic market share may be reluctant in opening up their airports. As a fact, Indonesia has been quite reserved on this matter—only opening five points for the co-terminal rights.²¹ This is not unexpected, since Indonesia has always been protective of their national airlines noticing its huge domestic market share.

The Covid-19 pandemic has brought an opportunity to test the Fourth Protocol in a scenario where some

ASEAN Member States' airlines might go bankrupt. This protocol could serve as an option to save the affected ASEAN Member States' air connectivity for a certain period. Furthermore, it could also stimulate tourism recovery through rapid turnover of foreign tourist visits. From this perspective, ASEAN Open Skies Protocol 4 could serve to strengthen air connectivity within the region.

²¹ ASEAN Open Skies Protocol 4, art. 2(3). The co-terminal rights shall be exercised between five Indonesian cities, namely Denpasar,

Jakarta, Makassar, Medan, and Surabaya.

6. The Way Forward and Policy Recommendations

There are two realistic steps that could be taken for the integration of the ASEAN region through the skies.



First, there is an urgency for the ASEAN Transport Working Group to restart the discussion on ASEAN Community Carrier. Such concept shall not only focus on ownership and control restriction, which is deemed sensitive for some ASEAN Member States at the current liberalisation stage. There are other benefits from a community carrier that can be addressed without raising ASEAN Member States' reluctance, such as slot priority scheme across specific ASEAN airports.



Second, in parallel, the ASEAN Transport Working Group should also review the minimum aircraft requirements in regards to airline establishment within the region. This issue will touch all ASEAN Member States aviation law. Investment-friendly provisions among the ASEAN Member States shall lead to new airlines establishment, which means a more seamless air connectivity. Ideally, this situation could encourage a better intra-ASEAN connectivity, especially flights serving remote and underdeveloped regions or cities.

In conclusion, there is indeed an urgency to establish a new ASEAN aviation sector guideline for accommodating such policy recommendations.

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** The views expressed in this report are the authors own.*

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API Report No.1: ASEAN Integration Report by Jayant Menon, Laurence Todd and Dramashakthini Arjuna (December 2019)

API Report No.2: EU-ASEAN FTA Report by Jayant Menon, Laurence Todd and Dramashakthini Arjuna (December 2019)

API Report No.3: ASEAN Integration Report 2019 by Jayant Menon, Laurence Todd, Azam Wan Hashim and Aiman Wan Alias (September 2019)

Navigating the Palm Oil Debate by Laurence Todd and Julia Ilhardt (October 2019)

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