

中国商务航空

探析摆在用户面前的官僚主义障碍及专家乐观预测的原因

Business aviation in **CHINA**

Here's a look at the administrative hurdles that remain for users—and why experts predict changes for the better.

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上海筹办三月的亚洲商用航空会议暨展览会 (ABACE)：商务航空工业将在中国迎来一个标志性的节点。私人飞机的黎明已经来临，但是由于对国内有意向运营商务飞机的人群尚不够明确，因此这场黎明仍然迷雾重重，而制造商和服务供应商利用上涨的需求盈利的前景也不明朗。

第一代中国商务喷气机业主在飞机进口的问题上，仍然面临着巨大的障碍。与此同时，由于机场基础设施仍在改善阶段，而航空公司准入门槛较高，机动性仍然受到影响，从而造成了这样一种印象：即商务航空就是用来运载——尤其是运载外国乘客的。

但是，据中国私人飞机开发先锋人物称，这一局势正在逐步向着方便用户的方向发展。这种趋势目前正在继续延伸，官方已经承认这一运输方式是中国最近五年经济计划的重点项目。

政府现阶段仍在沿用传统方法来控制飞机进站。有些西方专家考虑到国内现有基础设施可能还跟不上完全自由市场所生产的喷气机数量迅速上涨的步伐，对这种做法表示了肯定。

截至到2011年底，共有150余架商务喷气机在中国境内注册。按照制造商的预计，在接下来的二十年以及更远的未来，这一数字将会呈指数上涨。然而，就目前而言，中国飞机进口仍然面临着重重障碍，在进口港的沥青碎石路面上，停放着不计其数的商务飞机，正等待被放出关投入各自业主的怀抱。买家有时会选择在境外收货和注册，但是这也意味着他们在国内运营将会受到诸多限制——必须确保有些限制条件适用于外国人。对于在中国注册的飞机而言，这种要求相对宽松一些，因为少于29张乘客座椅的飞机可以由私人家庭使用，因此可以在国内比较自由地航行。

AS SHANGHAI PREPARES TO HOST THE ASIAN Business Aviation Conference & Exhibition in March, the business aviation industry appears to be at a pivotal point in China. The private aviation age has dawned here, but it remains a somewhat foggy dawn with reduced visibility for anyone wanting to operate business aircraft in the country. The outlook is barely any clearer for manufacturers and service providers seeking to capitalize on rising demand.

The first generation of Chinese business jet owners still face significant administrative hurdles to importing their aircraft. At the same time, current airport infrastructure and access to airways continues to dilute some of the flexibility that business aviation is supposed to deliver—and especially for foreigners.

But those who are pioneering the development of private aviation in the People's Republic say the situation is slowly becoming more user-friendly. That trend is set to continue now that this form of transportation has been officially acknowledged as a priority item in China's latest five-year economic plan.

For the time being, the government continues to take a conservative approach to controlling the influx of aircraft. It's a stance that some Western experts say is merited, given that the country's existing infrastructure probably couldn't cope with the deluge of jets that a completely unconstrained free market would produce.

By the end of 2011, little more than 150 business jets were registered in China, but manufacturers expect this number to grow exponentially over the next two decades and beyond. For the time being, though, the process of importing aircraft into the country remains cumbersome and there are tales of business jets sitting on tarmac at ports of entry waiting for release to their owners. In some cases, buyers opt to have their aircraft delivered outside China and registered there, but this means they are much more restricted in how they can operate within the country—having to endure some of the restrictions that apply to foreigners. For Chinese-registered aircraft, the situation is relatively straightforward in that any aircraft with fewer than 29 passenger seats is considered as being for private domestic use and so is relatively free to make trips within the country.

喷气机在中国航行的主要约束条件之一是，业主必须能够证明已经找到一家可接受的公司运营这架飞机。政府当局规定，喷气机必须按照管理合同航行。尽管全球服务供应商在中国已经尽了最大努力，然而已经获得必要的中国空中运营商证明的管理公司仍然较少。这在一定程度上是一个经典的进退维谷的局势：因为在中国还没有足够的运营商获得批准，因此很难将飞机引入中国，而且国内飞机数量也相对较少，尤其是国际合资公司还受到诸多限制，从而导致管理公司也难以开展业务。

大多数运营公司是中国主要国有控股的航空公司的关联公司，如此便能轻易地获得必要的批准，或者选择在香港、澳门的准离岸飞地落户。发展较快的飞机管理公司往往是中国航空公司和私营公司的合资企业，包括在商务航空领域具有丰富经验的西方集团。主要的新兴企业包括香港商用飞机有限公司、金鹿公务航空有限公司、尊爵公务机有限公司、中国国航北京航空有限责任公司、香港商务航空、以及海南航空子公司北京首都航空有限公司。

飞行员短缺也限制了中国的商务航空市场的扩张。为了提高运营的灵活性，机务人员通常必须是中国人，因此人员招聘来源通常是国内快速成长的航空公司，从而为招聘对象提供了赚外快的机会，最终导致应聘者薪资要求高、商务航空成本上涨。从理论上讲，掌握中文、并且通过了当地考试的西方飞行员是最合适的，但是这也是一项高难度的任务。许多外国运营商同样也以每天1,500美元的薪资水平聘用会讲中文的本国飞行员。这种举措有一大益处，即可以扩宽航空公司和机场人才来源的渠道，改变拒绝外国人才流入的现状。

在大陆机场的使用上，外国运营公司仍受限制。大部分只能使用大型机场，致使航班不能驶向与乘客最终目的地距离更近

ONE OF THE MAIN STICKING POINTS FOR CHINA'S would-be jet set is the requirement to be able to prove that you have found an acceptable company to operate the aircraft. The authorities require that the jet be flown under a management contract and, despite the best efforts of global service providers to get established in China, there are still relatively few management companies with the necessary Chinese air operators' certificate. In some respects, it's a classic Catch-22 situation: because there are not enough approved operators in China, it's hard to bring aircraft into the country, and yet because there are still relatively few aircraft, it's hard for the management companies to build their businesses—especially given the restrictions placed on international joint ventures.

Most of the operating companies are offshoots of largely state-owned Chinese airlines, which find it easiest to get the necessary approvals, and also operators based in the quasi-offshore enclaves of Hong Kong and Macau. Increasingly, faster-growing aircraft management companies are joint ventures between Chinese airlines and private companies, including Western-based groups that have more experience in business aviation. Among the main and emerging players are Metrojet, Deerjet, Asia Jet, Air China's Beijing Airlines, Hong Kong Jet and Hainan Airlines subsidiary Beijing Capital Airlines.

Another constraint on the expansion of China's business aviation market is a shortage of pilots. For operational flexibility, flight crew generally need to be Chinese and the obvious place to recruit them would be from the country's fast-growing airlines, where opportunities to earn overtime pay make the switch to business aviation a hard sell and a cost inflator. In theory, Western pilots who could master the Chinese language and pass local exams could fit the bill, but this is a tall order. In many cases, foreign operators also have to hire a local, Chinese-speaking navigator at a cost of up to \$1,500 per day. The advantage of doing this is that it could open up access to airways and airports that otherwise are off-limits for foreigners.

Non-Chinese operators remain restricted in terms of the numbers of mainland airports they can use. For the most part, they are confined to the major airports, obviating a key advantage of business aviation, namely the ability to fly closer to the passengers' final destination by using smaller airports. With airline traffic burgeoning in China, access to the country's major airports depends on getting landing slots and these are routinely granted to scheduled operators ahead of business aircraft.

There are still fewer than 200 civil airports in China and many of them are not available to private aircraft. By comparison, a large-cabin business jet in the U.S. can access more than 5,000 airports. However, according to flight-planning specialists, Chinese officials are starting to grant permission to fly into airports that have previously been blocked for foreign operators.

“Operating into China is much easier now than it was even two to three years ago, but it is still strict compared with some countries,” said Universal Weather & Aviation's Larry Williams, who helps business aircraft operators fly into and within the country.

“Now when we put in requests, the turnaround time is much faster,” added his colleague Justin Murray. “Before, we needed several weeks [to get flight permits] but now we are getting them



一些商用航空营运商将其飞行基地设立在香港这样的近海地区，因为相对于中国内地来说，在香港更容易获得营运执照。

Some business aviation operators base their airplanes in quasi-offshore enclaves such as Hong Kong, where they encounter less difficulty getting approvals for an air operator's certificate than they do in China.

的小型机场，因而无法发挥商务航空的优势。随着中国航空业务量迅速上涨，是否准入国内大型机场取决于着陆时隙，而着陆时隙通常由排定运营商分配，而不由商务飞机控制。

中国民用机场不足200座，而且大部分民用机场不对私人飞机开放。相比之下，美国允许大机舱商务喷气机入站的机场逾5,000座。然而，飞行计划专家认为，中国官方已经初步允许外国运营商旗下的飞机进入先前禁入的机场。

拉里·威廉斯是亚环航空信息咨询有限公司的工作人员，负责协助商务飞机运营商入境和在国内航行。他表示：“现在在中国开展业务比两三年前容易多了，但是与部分其它国家相比，限制条件仍然比较严格。”

同事贾斯汀·默里补充道：“现在下单通常快多了。以前，我们必须等上好几个星期（才能获得飞行许可），而现在只需要一个星期了，而且文书工作也简单些了。总而言之，程序的可预见性提高了。”

中国的飞行许可费和每次航空业务控制导航费高达数千美元，远远高出北美或欧洲同类航班的费用。除此以外，还需支付“政府补偿费”3,000美元/着陆点和机场费1,200美元。

正式发出中国市场准入邀请的赞助商是外国飞机运营商的飞行起点。在此之前，若想飞机在多个城市着陆，必须提供各目的地的赞助商的有关资料，包括详细地址。而现在，只需为整次航行找到一个赞助商，便已足矣。有关当局将会同赞助商一起检查有关航行的所有资料，保证确实有赞助商发出邀请，避免冒充、违规等现象发生。威廉斯解释说：“管理当局封杀了所有“花钱聘用”的假冒赞助商，公司也会绕道而行。赞助商也必须为发邀请的这一行为，当面接受有关责任。”

提高灵活性是私人飞机的主要目的之一，但在中国，并不指望通过发挥这一优势而充分获益。亚环航空信息咨询有限公司专家警告说，当乘客没有及时赶上飞机或者变更飞行的时间及地点等情况下，航空管理部门不会在最后一刻改变飞行计划。威廉斯认为中国官员已经越来越能够顺应这种局势，而且在某些情况下，他在收到通知后，能够在短时间内便获得新的许可。但是一般而言，亚环航空信息咨询有限公司的团队会按照需求管理客户的预期，从而制订尽可能周全的飞行计划，而不会做出任何变更。

根据洛克维尔·柯林斯航升航班信息解决方案，虽然中国允许变更飞行计划一次，但是这需要两到三个工作日，因此在一个城市只逗留一天的计划也是不切实际的。在没有新的许可，只可以在大约一个小时的范围内变更启航或抵达时间；如果变更幅度达到三个小时或以



湾流航空与中国海南航空集团签订了五架商务喷气机合同，由隶属于海南航空的金鹿公务航空有限公司负责营运。这五架喷气机将于今年陆续到货。

Gulfstream Aerospace signs a deal with China's Hainan Airlines Group for five business jets that will be operated by Hainan subsidiary Deerjet. The aircraft will be delivered starting this year.

within a week and it is also a bit simpler in terms of what they are looking for regarding paperwork. Overall, the process is becoming more predictable.”

Flight-permit and air-traffic-control navigation fees are far higher than they would be for equivalent flights in North America or Europe—amounting to several thousand dollars per trip. On top of this, you should budget for some \$3,000 in “government compensation fees” at every place you land, plus a \$1,200 airport fee.

THE STARTING POINT FOR ANY TRIP BY A FOREIGN AIRCRAFT operator is to have a sponsor—someone who is officially inviting you to come to China. Previously, if you wanted to make a trip that involved visits to multiple cities, you had to provide information about your sponsor for each destination, including full address details, but now a single sponsor for the entire trip will suffice. The authorities will check each aspect of the trip with sponsors to ensure that they genuinely issued the invitation, rather than it being a bogus arrangement to get around the rules. “The authorities have cracked down on ‘for-hire’ sponsors and this is not something that companies should be arranging for you; the sponsor needs to personally accept responsibility for having invited you,” explained Williams.

Flexibility is a big reason for flying privately, but don't count on being able to fully benefit from this advantage in China. The Universal experts warned that aviation authorities are not at all keen on last-minute changes to flight plans, such as if passengers arrive late for departure or change their mind about when and where they want to fly. According to Williams, Chinese officials are getting somewhat more accommodating in these situations and he has been able to secure new permits at short notice in some circumstances. But generally, the Universal team manages client expectations around the need to plan trips as thoroughly as possible and not count on being able to make changes.

It is possible to change flight plans once in China. But this can take two or three business days, which may well be impractical if you're planning to spend only a day in each city, according to Rockwell Collins Ascend Flight Information Solutions. You can generally change a departure or arrival time by an hour or so without a new permit, but to change them by three or more hours, you'll need approval that could take another day to arrange.

Universal's experience suggests that the requirement to hire a Chinese navigator no longer always applies. "It tends to be when you are flying to more remote areas, rather than to places like Shanghai and Beijing," explained Murray. "Some airways aren't listed on charts and are known only to Chinese pilots."

Immigration is another high-priority item for the Chinese trip-planning checklist. You should apply for your business or tourist visa in good time and if you can't be without your passport while it's being processed by your nearest Chinese embassy, you should be sure to get a second passport to use for trips in the interim. Your pilots will need crew visas and if one of them gets sick or can't make the trip, you'll need to be sure that replacement crew also hold a current visa. What's more, if you're going to change out your air crew for flights within China or your return trip (as might well be necessary for a prolonged itinerary), then any pilots or flight attendants heading home early by commercial airline will need to leave the country on a separate business or tourist visa.

"I see the restrictions in China lessening as they see the opportunity [presented by business aviation]," concluded Williams. "I wouldn't wing it in China—you need a support company and a good ground handler wherever you are going." Universal has offices in Beijing and Shanghai and can send its Chinese staff to back up clients anywhere in the country.

Other factors to consider are that if you are traveling to northern China in the winter there is little hangar space to protect your aircraft from the elements. It can take some time to get an aircraft de-iced—indeed, ground support services generally are pretty rudimentary.

Also be alert to the local holiday schedule—especially around the Chinese New Year. During these times the process for securing flight permits may be prolonged.

DESPITE THE MANY OPERATIONAL HURDLES, PRIVATE aviation still beats airline service in China, according to Matt Pahl, flight operations manager with Rockwell Collins Ascend Flight Information Solutions. But in his view, the practical challenges of operating into China haven't significantly improved yet in many respects and without the support of established trip planners it would be prohibitively difficult for foreigners.

Administratively, though, the situation is more straightforward, if only in that all flight requests can now be channeled through the General Administration of Civil Aviation of China (CAAC). A decade or more ago, all requests had to start with the aircraft owner's national embassy in Beijing, which would be required to submit a formal diplomatic note to the Chinese Ministry of Foreign Affairs and another to CAAC.

Rockwell Collins handles client requests through its five-strong Beijing office. While the official notice period for permits is still ad-

上,则需要提前一天提交审批。

根据亚环航空信息咨询有限公司的经验,聘请中国领航员的要求不一定适用。默里表示:“当飞向更遥远的地区时,而不是近如上海、北京等地,航海图上没有画出相应的航线,这时就只有中国飞行员才知道路线了。”

在中国,移民是行程计划清单上的重头项目。首先应及时地申请商务签证或旅游签证。如果附近的中国大使馆在审批签证时要求出具护照,旅客在乘坐飞机旅行时则需要另一本临时护照。飞行员也必须持有员工签证。如果其中某位飞行员因为生病或其他原因未能工作,则应确保替补飞行员也持有有效签证。此外,如果想在境内或返程航班更换机组人员(此类情况可能发生于远程航班),那么被替换的飞行员或空中服务员需凭各自的商务签证或旅游签证,乘商务航班返还。

威廉斯总结道,“中国的限制条件有所放松,毕竟商业航空带来了极好的机遇,我不打算在中国飞行,因为无论你去哪里,都需要一个支持公司和良好的地面处理团队。”亚环航空信息咨询有限公司在北京和上海都设有办事处,旗下的中国籍员工在中国各地支持客户。”

另外,还须对以下因素予以考虑:如果旅客冬天要飞往中国北部,那么必须确保留有一点机库空间用以保护机舱。给飞机“解冻”需要花费好些时间——的确,整体而言,地面支援服务尚处在初级阶段。



在设计创意中体现了一架飞行在香港上空的猎鹰 2000S。2010年,达索猎鹰在北京成立了亚洲销售总部。此外,达索也在香港设立了销售办事处,并于2012年上半年在上海设立了办事处。

This artist's rendering shows a Falcon 2000S over Hong Kong. Dassault Falcon established an Asian sales headquarters in Beijing in 2010. It also operates a sales office in Hong Kong, and it established another office in Shanghai in early 2012.

值得注意的是当地的假期安排，特别是中国的农历新年，因为在此期间，申请飞行许可证的审批进程将会延迟。

洛克维尔·柯林斯航升航班信息解决方案航班运营经理麦特·帕尔表示，尽管在运营过程中遇到诸多障碍，中国的私人飞机仍然击败了航班服务。但是，按照他的观点，在许多方面，进入中国市场所遇到的实际问题目前还没有得到明显改善，如果没有行程管理方面的支持，外国商家将很能解决这个问题。

但是，从管理角度来看，所有飞行申请都必须经过中国民用航空局（CAAC）的批准。在十几年前，申请飞行时，首先必须由飞机业主所在国的驻京大使馆向中国民用航空局和外交部分别提交一份正式的外交照会。

洛克维尔·柯林斯在五个驻京办事处处理客户申请。当时官方公布许可通知期限为10个工作日，帕尔却称他的工作人员保持着在24到48个小时内完成的良好记录。

按照他的观点，在中国遇到的最大挑战之一是，大多数商务航空业务仍然汇集在北京、上海的主要机场，如此便造成了航空业务过分拥堵的现象。例如，在北京，从上午八点到晚上十点的这个时间段，外国飞机每天只限进/出站15次，而商务喷气机则通常被滞留在机场。

为了避开北京机场的拥堵，也可以绕至位于北京以南的天津机场，但是两地相距90~120分钟的车程。到达全国各大机场的可选路线很少，而中国民用航空局还把一般的航空业务卡在许多机场门外。

专用基础设施已有一定改善。在2008年举办的奥运会的激励下，中国官员在北京首都机场为商务航空搭建了一块飞地。而在上海虹桥机场，也修建了便利的出城路线，通往较为偏远的浦东国际机场。中国的通用航空服务站为数不多，其中一个便建在虹桥机场，由澳大利亚霍克太平洋公司经营。

香港Evo Jet Services公司强调外国运营商在通过代理商安排行程时应避免理解当地的法规的重要性。而美国和英国的公司则非常容易误解这些处理费用。

Evo Jet公司的创始人克里斯·卡特赖特也曾发出警告，要求避免航线途经中国的限行空域（例如：从朝鲜到缅甸）。另外一个值得考虑的问题是，若接受中国境内或出境航班航线沿途乘客登机，可视为沿途航行业务，可能需要进行额外的文书工作，另外产生高达30,000美元的额外费用。



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去年在香港举办的亚洲航空国际展中，以庞巴迪全球特快XRS型商务喷气机为代表的商用机型独树一帜。

Business aircraft, such as this Bombardier Global Express XRS business jet, took center stage during last year's Asian Aerospace International Expo in Hong Kong.

advertised as being 10 working days, Pahl said that his staff have a good record of getting them in as little as 24 to 48 hours.

From his perspective, one of the greatest challenges in China is that most business aviation traffic is still going through the main airports in Beijing and Shanghai and these are overly congested with airline traffic. At Beijing, for instance, between 8 a.m. and 10 p.m. foreign-registered aircraft are limited to just 15 movements per day and business jets are often effectively blocked on these grounds.

South of Beijing, Tianjin is available as an alternative airport but this is a 90- to 120-minute drive from downtown. There are few alternatives to the main airports around the country and CAAC still excludes general aviation traffic from many airports altogether.

That said, some progress has been made in terms of dedicated infrastructure. The 2008 Olympic Games spurred Chinese officials to create an enclave for business aviation at Beijing Capital Airport. In Shanghai, Hongqiao Airport is a more convenient downtown option to the far more remote Pudong International Airport. Hongqiao is also home to one of the country's few purpose-built FBOs and this is run by Australia-based group Hawker Pacific.

Hong Kong-based Evo Jet Services flagged the importance for foreign operators to avoid inadvertently falling foul of their own countries legislation when having agents make trip arrangements for them. U.S. and UK companies in particular are subject to regulations that could misinterpret a facilitation fee.

Evo Jet founder Chris Cartwright also cautioned against planning flights to China over restricted airspace such as that of North Korea or Myanmar. Another consideration is that a flight involving passengers being collected along the way for flights within or out of China can be considered as cabotage operations and this can trigger additional paperwork and fees of up to \$30,000. ■