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Regulation (EEC) No 95/93, on common rules for the allocation of slots at EU airports, is being considered for revision by the European Commission.

**The airlines represented by the associations whose logos are printed above do not see any need for a revision or any justification for it, and believe that the introduction of new procedures would create the potential for yet additional significant disadvantages.**

The current Regulation meets the objective of providing an administrative mechanism for the allocation of scarce capacity at congested airports across Member States while allowing the necessary flexibility for all airlines to optimise their schedules in order to meet changing customer demand in a very competitive market. The Regulation ensures stability of slots and creates business certainty for operators, which leads to investment in new routes, equipment and employees. Once properly applied, the Regulation as it currently stands will provide the certainty needed to ensure a well-functioning slot allocation mechanism going forward into the future.

The problem lies not in the allocation of available capacity: it lies in the lack of capacity at congested airports. The need to introduce any form of slot restriction at an airport is an indication of failure on the part of governments or

**airport authorities to invest in essential aviation infrastructure. It is in no way the result of a weakness in the Regulation.**

**Any change to the Regulation will not solve this lack of capacity – the suggested alternatives merely seek to reallocate existing slots to different operators on different routes, with no proven benefit to passengers or freight shippers, which potentially disadvantages Europe’s citizens and businesses and drives up administrative costs for airlines. It is also likely to lead to the introduction of needless new rules which will have no discernible benefits for airlines and their passengers.**

**The key industry concern is the need for a greater level of consistency across Member States regarding how the current Regulation is applied and enforced. For example, slot coordinators are functioning particularly well in those countries where the requirements of independence, neutrality and transparency as laid out in the Regulation are enforced. We would encourage the Commission to focus on inconsistencies like this before proposing changes to the current Regulation.**

**Slot allocation takes place across a complex global network of airports and airlines. The current Regulation is consistent with that global context and with the IATA Worldwide Scheduling Guidelines.**

**We support the Commission undertaking detailed analysis of the Regulation’s performance, and the sharing of this analysis with key stakeholders prior to any revisions being made. We are concerned that the Commission is already considering policy options before first undertaking a thorough analysis of the functioning of the slot allocation system. However, we are confident that were such an analysis conducted objectively, the Commission would find that the system is not broken, it does not need fixing and it therefore will not benefit from revision.**