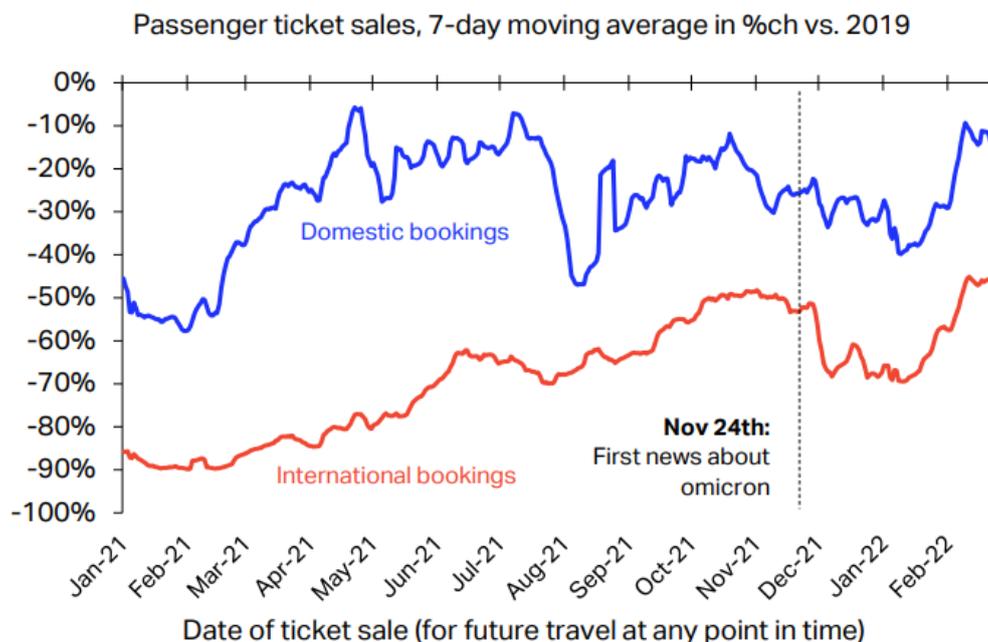


Brussels, May 24 2022: Members of AIRE were very pleased to see the publication of *Call for Evidence* regarding an update of the slot relief measures beyond the current IATA Summer 2022 Season. As the industry was hopeful for a good Summer with the vaccination rates going up, certain states easing travel restrictions and demand being seemingly back, yet another *black swan* emerged on the doorsteps of European aviation – war in Ukraine and consequent sanctions, airspace closures and near disappearance of major markets.

The above combined with the tendency of new COVID-19 variants to emerge in Autumn as well as the seasonality, which characterises European aviation calls for further extension of the slot relief measures.

We find three major aspects driving uncertainty in the sector and which support the argument for further revision of the standard slot-related policies – these are: continued uncertainty and travel restrictions caused by the COVID-19 pandemic, Russian aggression on Ukraine and necessity to restructure hub connectivity, flight planning and seeking markets that would compensate for the lost ones and finally seasonality which characterises European aviation and which under normal circumstances can be planned for, but it cannot in the current situation.

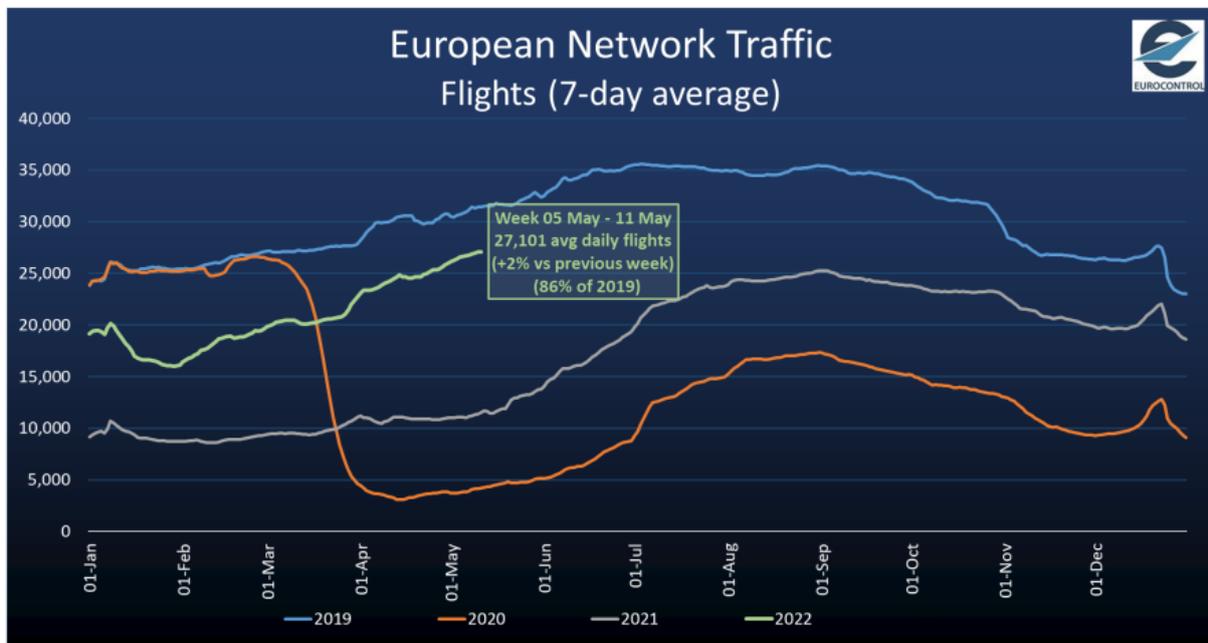
Too many times during the pandemic have authorities fallen victim of over-optimism in terms of upping the slot usage threshold and taking away the flexibility in planning from airlines, only to be later hit by an emergence of a new variant, which necessitated further and sudden actions. We hope and expect that this *Call for Evidence* is a proof that the legislators are learning their lessons from the previous seasons and we anticipate that the same mistakes will not be repeated. The appearance of the Omicron variant had a major impact on the demand and airlines’ schedules, but the flexibility of schedule adjustment was not there as JNUS provisions were limited only to *hard* travel restrictions, which at that point were no longer applied. Below graph prepared by IATA Economics, which clearly shows the impact the widespread of new variant had on the booking activity:



Source: IATA Economics using DDS ticketing data (23 Feb 2022)

As soon as the sector recovered from the hit of Omicron, it was shook by Russian aggression on Ukraine and the consequent airspace closures, which yet again flipped the industry upside down as airlines had to suspend and/or reroute certain operations. Furthermore, the current process of granting alleviation to slots cancelled or changed due to war has tied both airlines' and slot coordinators' hands in terms of being able to cancel and/or reallocate these slots, because the official documents (NOTAMs or Regulations) either have a very short discontinuation date, and therefore do very little to solve the problem of releasing capacity at the airports, or do not specify discontinuation date at all and consequently the Coordinators cannot grant alleviation for such cancellations and the industry stakeholders ranging from airlines, airports, ground handling agents, slot coordinators, and naturally Passengers, suffer from uncertainty and suboptimal use of scarce capacity.

Travel restrictions in Asia and the closure of Siberian corridors between Europe and Asia only deepen the problem of seasonality that characterises European aviation. Even prior to the pandemic, European sky saw much more traffic during the summer months than winter, as shown in Eurocontrol's Network Traffic report (dated May 12th) with distinctively curved blue line showing pre-pandemic 2019:



*source Eurocontrol: <https://www.eurocontrol.int/sites/default/files/2022-05/eurocontrol-comprehensive-air-traffic-assessment-20220512.pdf>

Weaker demand for winter travels combined with travel restrictions in Asia, which is the *go-to* destination for many Europeans during winter season, as well as necessity to reroute and reschedule flights to that region due to airspace closures paint a grim picture in terms of winter recovery.

All of the above lead us to argue that the sector continuously needs support from the highest Authorities in terms of the adjustment of the slot policy that shapes European aviation.

We therefore argue that the European Commission, at the very least, maintains provisions for lowering the slot utilisation threshold and for Winter 2022 decides against artificially upping it from the current 64/36 threshold.

Additionally, we believe that JNUS proved to be a very useful tool however, as already argued in AIRE's position paper on so called *Ghost Flights*, it requires enhancements with regards to applicability (to include war-related changes beyond COVID-19 restrictions), clarity and harmonised application and acceptance by all stakeholders.

As Airlines International Representation in Europe, we humbly look forward to seeing the results of the *Call for Evidence* and hope that our voice will be heard as it echoes the views of our Members and most importantly our valued Customers.

On behalf of AIRE,
Michael Harrington
Director General