

AIRE's position paper regarding the revision of the Air Service Regulation 1008/2008 on common rules for the operation of air services

Airlines International Representation in Europe supports the possible revision of the **Air Services Regulation** as it aims to enhance sustainability, resilience, and social responsibility in aviation. The changes should contribute to **future-proof the sector while preserving connectivity, competition, and high-quality jobs, and improving the financial resilience of air carriers**. Key areas under consideration include Public Service Obligations (PSO), leasing practices, financial conditions, ownership and control assessments, and price transparency.

- **AIRE is generally positive about potential reforms that could enhance the flexibility of Public Service Obligation (PSO) regulations**, which are designed to guarantee essential air services to remote or underserved regions. By liberalizing the leasing market for both dry and wet leases, these changes could foster greater competition and innovation in the aviation sector.
- We are concerned about proposals that might introduce **stringent financial criteria**, such as **higher minimum cash reserves**, and those affecting **labour market regulations**. Specifically, regulations that would impose restrictions on employment forms are viewed negatively, as they could increase operational costs without enhancing safety.
- **Employment regulations should not interfere with the freedom to choose employment forms** or significantly alter business operations.

AIRE is concerned about the **postponing of the revision of the Air Services Regulation**, since it will hinder the industry's progress toward greater sustainability and resilience, impeding efforts to address long-term challenges effectively.