



23 December 2020

Filip Cornelis
DG MOVE
European Commission
Rue de Mot 24
B-1040 Brussels

Dear Filip,

As you know, the European Airport Coordinators Association (EUACA) took part in the aviation industry discussions which led to the WASB recommendation for Summer 2021. We have also been pleased to have a dialogue with the European Commission on its proposal for a revised Slot Regulation to manage the recovery of aviation from the Covid-19 pandemic.

We believe it would be useful to provide some more detailed comments on the Commission's proposal in the attached document. We would also like to offer some observations on key differences between the WASB recommendation and the Commission's proposal, in a second document. These are intended to contribute a practical, independent view to discussions about the two different approaches.

We would also highlight a further conceptual difference between the Commission's proposal and the WASB recommendation. The WASB recommendation would allow an early and full series reallocation of slots for ad hoc use in Summer 2021, and thus provide greater schedule certainty sooner for airlines, airports, and consumers. The Commission's proposal is likely to result in later, piecemeal handbacks and reallocation of slots, which could lead in the coming Summer to less efficient use of capacity. However, the proposal could also facilitate greater slot mobility and competitive changes in markets beyond Summer 2021.

EUACA will continue to be available for further discussions with the Commission and European co-legislators to find the best possible solution for both Summer 2021 and beyond.

Yours sincerely

Didier Hocq
Chair