

AviAlliance Position on the EU Aviation Strategy Initiative

AviAlliance welcomes the European Commission's initiative for a new EU Aviation Strategy. As a private international airport investor and manager operating across Europe and beyond, AviAlliance brings a perspective that complements national industry associations. We are a long-term infrastructure investor. Our ability to commit capital depends directly on regulatory clarity, fair framework conditions, and a stable investment environment.

The new strategy must recognize private investment as a central pillar of European airport infrastructure – not merely a complement to public funding. The following positions reflect AviAlliance's priorities for the strategy.

Airport Charges Directive: Preserve the Framework, Improve Transparency

The Airport Charges Directive provides the regulatory foundation for sustainable airport investment. AviAlliance supports continuity of the current framework, in particular the dual-till principle, which enables airports to fund infrastructure investment while incorporating environmental costs into charges.

Regulatory certainty is a prerequisite for long-term capital commitment. Any revision of the ACD must not undermine the investment case for airport infrastructure. At the same time, AviAlliance supports improvements to transparency requirements and the integration of environmental criteria into the charging framework, in line with the EU's decarbonization objectives.

Slot Regulation: Reform to Unlock Capacity and Competition

The current slot allocation framework, based on grandfather rights, creates barriers to competition and prevents optimal use of scarce airport capacity. AviAlliance calls for a modernization of the Slot Regulation to include market-based allocation mechanisms – such as slot auctioning or secondary trading – that reduce entry barriers for new airlines, encourage competition, and support more efficient use of airport infrastructure.

The existing 80/20 use-it-or-lose-it rule is inadequate: a 20 percent non-utilization threshold represents a significant and unjustifiable level of infrastructure inefficiency. AviAlliance calls for the threshold to be reduced to a maximum of 10 percent, bringing the rule in line with operational realities and ensuring that scarce slot capacity is actively used.

Allowing airports to reallocate underused slots would improve capacity management at coordinated airports and support the continued growth of the European aviation network. Greater slot flexibility directly supports the ability for airports to attract new carriers and diversify route networks. This reform should be explicitly addressed in the new strategy.

Single European Sky: Deliver on Existing Commitments

Capacity bottlenecks in European airspace impose direct costs on airports and passengers. AviAlliance supports full implementation of the Single European Sky framework as a priority. More efficient airspace capacity management and greater transparency at Network Manager level are needed to reduce delays, cut emissions, and improve the competitiveness of European hubs.

Aviation Security: Harmonize and Modernize

Modern screening technologies for passengers, baggage, and cargo should be approved and deployed consistently across the EU without compromising operational efficiency. Harmonized rules for counter-UAS measures at airports are needed to address the growing risk of unauthorized drone operations near aerodromes, with clear allocation of roles and legal responsibilities between airport operators and law enforcement.

Regulatory Framework: Clarity Over Complexity

Long-term private investment in airport infrastructure requires a stable, predictable regulatory environment. AviAlliance calls on the Commission to reduce the administrative burden on airports, streamline reporting and compliance obligations, and avoid overregulation – particularly in sustainability, environmental protection, and aviation security. Regulatory coherence across member states is essential for investors operating across multiple jurisdictions.

AviAlliance sees no need for a revision of the Ground Handling Directive. The existing framework provides an adequate basis for fair and efficient ground handling operations; further regulatory intervention would increase operational complexity without commensurate benefit.

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