

Public consultation for the Fitness Check of EU airport legislation

Fields marked with * are mandatory.

1

Introduction

The liberalisation of the internal aviation market has been a major EU success, contributing significantly to economic growth and the free movement of people and goods. However, changing market dynamics and new environmental priorities necessitate a review of existing airport legislation to ensure it remains effective and relevant.

From the perspective of the internal market, three key pieces of legislation regulate EU airport capacity and infrastructure:

- [The Slot Regulation \(EEC\) No 95/93](#) regulates airline access to congested airports where not enough capacity is available to satisfy demand;
- [The Airport Charges Directive 2009/12/EC](#) provides a framework for the pricing of access to airport infrastructure and services;
- [The Groundhandling Directive 96/67/EC](#) governs access to groundhandling services at airports (i.e. the services required by an airline between landing and take-off of its aircraft).

These legislative measures have introduced transparency, non-discrimination, and independent oversight in the allocation of airport slots, the setting of airport charges, and the provision of groundhandling services. Collectively, they have played a vital role in opening the airport infrastructure market, fostering competition among airlines, airports, and groundhandling companies, and ultimately enhancing consumer benefits.

This public consultation seeks your input on whether the current legislation effectively meets its original objectives, specifically regarding the efficient use of airport capacity, fostering competition, maintaining transparent oversight, and ensuring service quality and reliability. Your feedback will also help evaluate the relevance, coherence and EU added value of this legislation considering new political priorities, such as environmental sustainability and resilience.

The survey is composed of two main sections: the first section contains general questions about the respondent, and the second section is further divided into five parts. These parts correspond to the criteria used in the assessment:

- Effectiveness: Are the three pieces of legislation achieving their intended goals?
- Efficiency: Are they the most cost-effective means?
- Relevance: Do they address current and upcoming market needs?
- Coherence: Are they consistent internally and with other EU policies and interventions?
- EU Added Value: Do they provide benefits that could not be achieved at the national level alone?

This questionnaire is designed to reach both members of the general public and non-experts, as well as interested stakeholders. Simultaneously, selected stakeholders with expert knowledge are participating in a targeted consultation, which also forms part of the evaluation process.

2 About you

* 2.1 Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☒ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ German
- ☐ Greek
- ☐ Hungarian
- ☐ Irish
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐

- Polish
- ☐ Portuguese
- ☐ Romanian
- ☐ Slovak
- ☐ Slovenian
- ☐ Spanish
- ☐ Swedish

*2.2 I am giving my contribution as

- ☐ Academic/research institution
- ☐ Business association
- ☐ Company/business
- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☒ Public authority
- ☐ Trade union
- ☐ Other

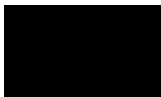
*2.3 Scope

- ☐ International
- ☐ Local
- ☒ National
- ☐ Regional

*2.5 Level of governance

- ☐ Parliament
- ☒ Authority
- ☐ Agency

*2.8 First name



* 2.9 Surname

* 2.10 Email (this won't be published)

* 2.11 Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- | | | | |
|---|--|--|--|
| ☐ Afghanistan | ☐ Djibouti | ☐ Libya | ☐ Saint Martin |
| ☐ Åland Islands | ☐ Dominica | ☐ Liechtenstein | ☐ Saint Pierre and Miquelon |
| ☐ Albania | ☐ Dominican Republic | ☐ Lithuania | ☐ Saint Vincent and the Grenadines |
| ☐ Algeria | ☐ Ecuador | ☐ Luxembourg | ☐ Samoa |
| ☐ American Samoa | ☐ Egypt | ☐ Macau | ☐ San Marino |
| ☐ Andorra | ☐ El Salvador | ☐ Madagascar | ☐ São Tomé and Príncipe |
| ☐ Angola | ☐ Equatorial Guinea | ☐ Malawi | ☐ Saudi Arabia |
| ☐ Anguilla | ☐ Eritrea | ☐ Malaysia | ☐ Senegal |
| ☐ Antarctica | ☐ Estonia | ☐ Maldives | ☐ Serbia |
| ☐ Antigua and Barbuda | ☐ Eswatini | ☐ Mali | ☐ Seychelles |
| ☐ Argentina | ☐ Ethiopia | ☐ Malta | ☐ Sierra Leone |
| ☐ Armenia | ☐ Falkland Islands | ☐ Marshall Islands | ☐ Singapore |
| ☐ Aruba | ☐ Faroe Islands | ☐ Martinique | ☐ Sint Maarten |
| ☐ Australia | ☐ Fiji | ☐ Mauritania | ☐ Slovakia |
| ☐ Austria | ☐ Finland | ☐ Mauritius | ☐ Slovenia |
| ☐ Azerbaijan | ☐ France | ☐ Mayotte | ☐ Solomon Islands |

☐ Bahamas	☐ French Guiana	☐ Mexico	☐ Somalia
☐ Bahrain	☐ French Polynesia	☐ Micronesia	☐ South Africa
☐ Bangladesh	☐ French Southern and Antarctic Lands	☐ Moldova	☐ South Georgia and the South Sandwich Islands
☐ Barbados	☐ Gabon	☐ Monaco	☐ South Korea
☐ Belarus	☐ Georgia	☐ Mongolia	☐ South Sudan
☐ Belgium	☐ Germany	☐ Montenegro	☐ Spain
☐ Belize	☐ Ghana	☐ Montserrat	☐ Sri Lanka
☐ Benin	☐ Gibraltar	☐ Morocco	☐ Sudan
☐ Bermuda	☐ Greece	☐ Mozambique	☐ Suriname
☐ Bhutan	☐ Greenland	☐ Myanmar/Burma	☐ Svalbard and Jan Mayen
☐ Bolivia	☐ Grenada	☐ Namibia	☐ Sweden
☐ Bonaire Saint Eustatius and Saba	☐ Guadeloupe	☐ Nauru	☐ Switzerland
☐ Bosnia and Herzegovina	☐ Guam	☐ Nepal	☐ Syria
☐ Botswana	☐ Guatemala	☒ Netherlands	☐ Taiwan
☐ Bouvet Island	☐ Guernsey	☐ New Caledonia	☐ Tajikistan
☐ Brazil	☐ Guinea	☐ New Zealand	☐ Tanzania
☐ British Indian Ocean Territory	☐ Guinea-Bissau	☐ Nicaragua	☐ Thailand
☐ British Virgin Islands	☐ Guyana	☐ Niger	☐ The Gambia
☐ Brunei	☐ Haiti	☐ Nigeria	☐ Timor-Leste
☐ Bulgaria	☐ Heard Island and McDonald Islands	☐ Niue	☐ Togo
☐ Burkina Faso	☐ Honduras	☐ Norfolk Island	☐ Tokelau
☐ Burundi	☐ Hong Kong	☐ Northern Mariana Islands	☐ Tonga

- | | | | |
|--|-----------------------------------|---|--|
| ☐ Cambodia | ☐ Hungary | ☐ North Korea | ☐ Trinidad and Tobago |
| ☐ Cameroon | ☐ Iceland | ☐ North Macedonia | ☐ Tunisia |
| ☐ Canada | ☐ India | ☐ Norway | ☐ Türkiye |
| ☐ Cape Verde | ☐ Indonesia | ☐ Oman | ☐ Turkmenistan |
| ☐ Cayman Islands | ☐ Iran | ☐ Pakistan | ☐ Turks and Caicos Islands |
| ☐ Central African Republic | ☐ Iraq | ☐ Palau | ☐ Tuvalu |
| ☐ Chad | ☐ Ireland | ☐ Palestine | ☐ Uganda |
| ☐ Chile | ☐ Isle of Man | ☐ Panama | ☐ Ukraine |
| ☐ China | ☐ Israel | ☐ Papua New Guinea | ☐ United Arab Emirates |
| ☐ Christmas Island | ☐ Italy | ☐ Paraguay | ☐ United Kingdom |
| ☐ Clipperton | ☐ Jamaica | ☐ Peru | ☐ United States |
| ☐ Cocos (Keeling) Islands | ☐ Japan | ☐ Philippines | ☐ United States Minor Outlying Islands |
| ☐ Colombia | ☐ Jersey | ☐ Pitcairn Islands | ☐ Uruguay |
| ☐ Comoros | ☐ Jordan | ☐ Poland | ☐ US Virgin Islands |
| ☐ Congo | ☐ Kazakhstan | ☐ Portugal | ☐ Uzbekistan |
| ☐ Cook Islands | ☐ Kenya | ☐ Puerto Rico | ☐ Vanuatu |
| ☐ Costa Rica | ☐ Kiribati | ☐ Qatar | ☐ Vatican City |
| ☐ Côte d'Ivoire | ☐ Kosovo | ☐ Réunion | ☐ Venezuela |
| ☐ Croatia | ☐ Kuwait | ☐ Romania | ☐ Vietnam |
| ☐ Cuba | ☐ Kyrgyzstan | ☐ Russia | ☐ Wallis and Futuna |
| ☐ Curaçao | ☐ Laos | ☐ Rwanda | ☐ Western Sahara |
| ☐ Cyprus | ☐ Latvia | ☐ Saint Barthélemy | ☐ Yemen |
| ☐ Czechia | ☐ Lebanon | ☐ Saint Helena
Ascension and
Tristan da Cunha | ☐ Zambia |

- ☐ Democratic Republic of the Congo
- ☐ Lesotho
- ☐ Saint Kitts and Nevis
- ☐ Zimbabwe
- ☐ Denmark
- ☐ Liberia
- ☐ Saint Lucia

* 2.12 Organisation name

255 character(s) maximum

Ministry of Infrastructure and Water Management

2.14 Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

* 2.15 Organisation size

- ☐ Micro (1 to 9 employees)
- ☐ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☒ Large (250 or more)

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* 2.17 Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

☒ Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and

your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

☒ **Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☒ I agree with the [personal data protection provisions](#)

3 Questions

3.1 Effectiveness (Are the three pieces of legislation achieving their intended goals?)

3.1.1 To what extent do you agree with the following statements?

	Not at all	To a small extent	To a great extent	Fully	I do not know
* EU airports provide competitive connectivity in line with consumer demand (i.e., availability of destinations, flight frequencies, number of carriers on the same route, affordable ticket prices)	☐	☐	☒	☐	☐
* Airport capacity is used efficiently (i.e., airport infrastructure is managed and coordinated in a way that maximizes the number of aircrafts and passengers the airport can handle, without compromising the quality of service)	☐	☒	☐	☐	☐
* Airport infrastructure, capacity, and groundhandling services are priced efficiently (i.e., The prices charged reflect the true cost and value of these services, encourage optimal use and timely investments, while promoting both fairness and economic efficiency)	☐	☐	☒	☐	☐

3.1.2 Please provide a brief explanation of your reasons for selecting any of the responses above.

1000 character(s) maximum

In general airport capacity is used efficiently, but regarding super congested airport there is room to use the last bit of capacity more efficiently. For example by utilising overbookings after HBD to guarantee 100% utilisation. Regarding the ACD we would welcome recommendations from the Commission to harmonise the implementation within the framework of the directive. This could enhance consistency and promote greater efficiency in the system's application between different airports and member states.

3.1.3 In your opinion, are there any obstacles for EU airports to provide connectivity in line with consumer demand (i.e., availability of destinations, flight frequencies, number of carriers on the same route and affordable ticket prices)? Please briefly explain your view.

2000 character(s) maximum

This answer depends on how consumer demand is defined. Airlines serve markets based on demand and supply, and establish their presence accordingly. However, this also means that there will continue to be underserved destinations.

3.1.4 To what extent have the original objectives of the three pieces of legislation been achieved?

	Not at all	To a small extent	To a great extent	Fully	I do not know
* Efficient use of slots - ensure efficient use of available landing and take-off slots at airports with scarce capacity	☐	☒	☐	☐	☐
* Fair allocation of slots – ensure that slots are allocated fairly among airlines, without discrimination, and transparently	☐	☐	☐	☒	☐
* Airport charges transparency - ensure transparency over the basis for setting charges and how charges are calculated so that charges setting is clear and fair	☐	☐	☐	☒	☐
* Non-discrimination in charges - ensure non-discriminatory setting and application of airport charges among airport users	☐	☐	☐	☒	☐
* Consultations - ensure regular consultations of airport users by airport managers on the operation of the system of charges, the level of charges and quality of service	☐	☐	☐	☒	☐
* Increased competition – ensure that airports operate in a competitive environment and do not apply excessive charges	☐	☐	☒	☐	☐
* Dispute resolution system - ensure that airports and airlines have a system for resolving disputes over airport charges	☐	☐	☐	☒	☐

* **Groundhandling services** - improve the quality of services and lower their prices by allowing independent third parties to offer groundhandling services at large EU airports



3.1.5 To what extent is the current EU legislation effective in ensuring fair competition, facilitating entry to the market for new entrants and preventing the misuse of market power by different stakeholders?

	Not at all	To a small extent	To a great extent	Fully	I do not know
* Slot Regulation	☐	☐	☒	☐	☐
* Airport Charges Directive	☐	☐	☒	☐	☐
* Groundhandling Directive	☐	☐	☒	☐	☐
* Combined impact of the three pieces of legislation	☐	☐	☐	☐	☒
* The broader regulatory environment (e.g., including rules on air traffic management, safety, environmental protection, competition)	☐	☐	☒	☐	☐

3.1.6 Please provide specific examples of rules that in your view could hinder or prevent fair competition in the sector (e.g. make it difficult to enter the market or can lead to misuse of market power by different stakeholders) and explain how it could happen. Please be as specific as possible.

2000 character(s) maximum

At highly congested airports, the slot regulation can result in limited market access for new entrants.

3.1.7 To what extent do the three pieces of legislation guarantee an independent oversight of the rules they introduced and transparency in the areas they cover?

	Not at all	To a small extent	To a great extent	Fully	I do not know
* Slot Regulation	☐	☐	☐	☒	☐
* Airport Charges Directive	☐	☐	☐	☒	☐
* Groundhandling Directive	☐	☐	☐	☒	☐

3.1.8 Please provide a brief explanation of your reasons for selecting any of the responses above.

1000 character(s) maximum

3.1.9 Have any external factors (e.g. social trends, global changes, technological progress, other legislation) influenced the effectiveness of the three pieces of legislation? If yes, how have they done so?

2000 character(s) maximum

The Slot Regulation, introduced in 1993, was designed for a different era — one where airport congestion was seen as temporary. Today situation requires a more modern framework that allows for better steering of the remaining scarce capacity, ensuring it is used as efficiently and effectively as possible and to serve broader (national) policy goals such as connectivity, freight, and sustainability. In general, how member states have been affected by of have dealt with the pandemic has been an external factor that has influenced the effectiveness of the legislation in maintaining a level playing field.

3.2 Efficiency (Are the three pieces of legislation the most cost-effective means?)

3.2.1 For you, your company, or the stakeholders you represent, do the three pieces of legislation provide overall more benefits than costs, or vice versa?

	Much more costs than benefits	More costs than benefits	Costs equal benefits	More benefits than costs	Much more benefits than costs	I do not know
* Slot Regulation	☐	☐	☐	☐	☒	☐
* Airport Charges Directive	☐	☐	☒	☐	☐	☐
* Groundhandling Directive	☐	☐	☒	☐	☐	☐

3.2.2 Please provide a brief explanation of your reasons for selecting any of the responses above.

1000 character(s) maximum

3.2.3 Do you perceive any differences in how the three pieces of legislation are applied by Member States?

	No differences at all	Minor differences	Some differences	Significant differences	Very substantial differences	I do not know
* Slot Regulation	☐	☐	☒	☐	☐	☐
* Airport Charges directive	☐	☐	☐	☒	☐	☐
* Groundhandling Directive	☐	☐	☐	☒	☐	☐

3.2.4 If you have replied that there are differences in how the three pieces of legislation are applied by Member States, what level of costs do these differences generate for you, company/organisation/stakeholder you represent?

	No differences (no additional costs)	Existing differences do not generate additional cost	Existing differences generate minor additional costs	Existing differences generate moderate costs	Existing differences generate significant costs	I do not know
* Slot Regulation	☐	☒	☐	☐	☐	☐
* Airport Charges directive	☐	☐	☐	☐	☐	☒
* Groundhandling Directive	☐	☐	☐	☐	☐	☒

3.2.5 Please provide your best estimate of the annual additional costs (i.e., only the extra cost due to being covered by each piece of legislation and fulfilling the respective requirements) generated for you, company/organisation/stakeholder you represent by each of the three pieces of legislation.

	I am not covered by this piece of legislation	This legislation does not generate additional costs for me	This legislation generates additional costs for me (please provide below your best estimate)	I do not know
* Slot Regulation	☐	☒	☐	☐
* Airport Charges Directive	☐	☒	☐	☐
* Groundhandling Directive	☐	☒	☐	☐

3.2.9 If you believe the efficiency of one or more of three pieces of legislation could be enhanced, please briefly describe how it might be achieved.

2000 character(s) maximum

Capacity could be used more efficiently if the regulation gives more flexibility in the allocation throughout the season. 100% utilization from HBD-allocated slots is not feasible. It can be easier to use all available capacity, by overbooking the initial threshold after HBD, and monitoring usage periodically. The overbooked slots should be used for slot requests on a short notice, to guarantee continuous slot possibilities for ad-hoc operations, such as cargo, leisure and charter flights.

3.2.10 Is there potential for rule simplification and/or burden reduction in any of the three pieces of legislation?

	No	To a small extent	To a great extent	I do not know
* Slot Regulation	☒	☐	☐	☐
* Airport Charges Directive	☒	☐	☐	☐
* Groundhandling Directive	☒	☐	☐	☐

3.2.11 Do you have any examples of potential rule simplifications and/or burden reductions for any of the three pieces of legislation? Please briefly describe them.

2000 character(s) maximum

From the perspective off the national authority there would be interest to focus on clarification rather than simplification.

3.3 Relevance (Do the three pieces of legislation address current and upcoming market needs?)

3.3.1 To what extent do the original objectives of the three pieces of legislation remain relevant/important to be addressed today?

	Not at all	To a small extent	To a great extent	Fully	I do not know
* Efficient use of slots - ensure efficient use of available landing and take-off slots at airports with scarce capacity	☐	☐	☐	☒	☐
* Fair allocation of slots - ensure slots are allocated fairly among airlines, without discrimination, and transparently	☐	☐	☐	☒	☐
* Airport charges transparency - ensure transparency over the basis for setting charges and how charges are calculated so that charges setting is clear and fair	☐	☐	☐	☒	☐
* Non-discrimination in charges - ensure non-discriminatory setting and application of airport charges among airport users	☐	☐	☐	☒	☐
* Consultations - ensure regular consultations between airports and airlines on airport charges	☐	☐	☐	☒	☐
* Increased competition - ensure that airports operate in a competitive environment and do not charge excessive charges	☐	☐	☐	☒	☐
* Dispute resolution system - ensure that airports and airlines have a system for resolving disputes over airport charges	☐	☐	☐	☒	☐
* Groundhandling services - improve the quality of services and lower their prices by allowing independent third parties to offer groundhandling services at large EU airports	☐	☐	☒	☐	☐

3.3.2 Are the current provisions of **the Slot Regulation** able to address the following identified market developments and challenges?

	Not a right tool to address this development/challenge	Not at all	To a small extent	To a great extent	Fully	I do not know
* Airline consolidation	☐	☐	☒	☐	☐	☐
* Competition from non-EU airports	☐	☐	☐	☒	☐	☐
* Competition from non-EU airlines	☒	☐	☐	☐	☐	☐
* Airport capacity constraints	☐	☐	☐	☒	☐	☐
* Access for new airlines at congested airports	☐	☐	☒	☐	☐	☐
* Labour shortage	☐	☐	☒	☐	☐	☐
* Environmental impact of transport (decarbonisation, noise, etc.)	☐	☐	☒	☐	☐	☐
* EU's strategic autonomy and resilience	☒	☐	☐	☐	☐	☐
* Digitalisation/AI	☐	☐	☐	☐	☐	☒
* Multimodality	☐	☐	☐	☒	☐	☐
* Natural disasters/pandemics (e.g., COVID-19)	☐	☐	☐	☒	☐	☐
* Armed conflicts near EU borders (e.g., Russian war of aggression in Ukraine)	☐	☐	☐	☒	☐	☐
* Hybrid or armed attacks against EU Members	☐	☒	☐	☐	☐	☐

3.3.3 Are the current provisions of **the Airport Charges Directive** able to address the market developments and challenges identified below?

	Not a right tool to address this development/challenge	Not at all	To a small extent	To a great extent	Fully	I do not know
* Airline consolidation	☒	☐	☐	☐	☐	☐
* Competition from non-EU airports	☒	☐	☐	☐	☐	☐
* Competition from non-EU airlines	☐	☐	☒	☐	☐	☐
* Airport capacity constraints	☒	☐	☐	☐	☐	☐
* Access for new airlines at congested airports	☒	☐	☐	☐	☐	☐
* Labour shortage	☒	☐	☐	☐	☐	☐
* Environmental impact of transport (decarbonisation, noise, etc.)	☐	☐	☒	☐	☐	☐
* EU's strategic autonomy and resilience	☐	☐	☒	☐	☐	☐
* Digitalisation/AI	☐	☐	☐	☐	☐	☒
* Multimodality	☐	☐	☐	☐	☐	☒
* Natural disasters/pandemics (e.g., COVID-19)	☐	☐	☒	☐	☐	☐
* Armed conflicts near EU borders (e.g., Russian war of aggression in Ukraine)	☒	☐	☐	☐	☐	☐
* Hybrid or armed attacks against EU Members	☒	☐	☐	☐	☐	☐

3.3.4 Are the current provisions of **the Groundhandling Directive** able to address the market developments and challenges identified below?

	Not a right tool to address this development/challenge	Not at all	To a small extent	To a great extent	Fully	I do not know
* Airline consolidation	☐	☐	☒	☐	☐	☐
* Competition from non-EU airports	☐	☐	☐	☒	☐	☐
* Competition from non-EU airlines	☐	☐	☐	☒	☐	☐
* Airport capacity constraints	☒	☐	☐	☐	☐	☐
* Access for new airlines at congested airports	☐	☐	☐	☒	☐	☐
* Labour shortage	☐	☐	☒	☐	☐	☐
* Environmental impact of transport (decarbonisation, noise, etc.)	☒	☐	☐	☐	☐	☐
* EU's strategic autonomy and resilience	☐	☐	☐	☐	☐	☒
* Digitalisation/AI	☐	☐	☐	☐	☐	☒
* Multimodality	☐	☐	☐	☐	☐	☒
* Natural disasters/pandemics (e.g., COVID-19)	☒	☐	☐	☐	☐	☐
* Armed conflicts near EU borders (e.g., Russian war of aggression in Ukraine)	☒	☐	☐	☐	☐	☐
* Hybrid or armed attacks against EU Members	☒	☐	☐	☐	☐	☐

3.3.5 Are there any additional market developments or challenges, beyond those mentioned earlier, that affect the functioning and objectives of the current airport legislation (i.e. the three pieces of legislation)? Please briefly explain your view.

2000 character(s) maximum

When full capacity is reached, and almost all slots are allocated on a historical basis, specific sectors cannot be served adequately. For example, in the Netherlands, we have seen a decline in full freighter movements, as that specific type of operations does not benefit well from the allocation rules. Therefore, we believe that it should be possible to create more options for ad-hoc operations, to ensure that market developments such as declining types of operations can be safeguarded at airports, ensuring that capacity for those types of operations is not wasted.

3.4 Coherence (Are the three pieces of legislation consistent internally and with other EU policies and interventions?)

3.4.1 Are the three pieces of legislation internally coherent (i.e., there are no contradictions or gaps in each piece of legislation)?

	Yes	No	I do not know
* Slot Regulation	☒	☐	☐
* Airport Charges Directive	☒	☐	☐
* Ground handling Directive	☒	☐	☐

3.4.2 Please provide a brief explanation of your reasons for selecting any of the responses above.

1000 character(s) maximum

* 3.4.3 Are the Slot Regulation, Airport Charges Directive and Groundhandling Directive coherent with each other?

- ☒ Yes
- ☐ No
- ☐ I do not know

3.4.4 Please provide a brief explanation of your reasons for selecting any of the responses above.

1000 character(s) maximum

* 3.4.5 To what extent have the three pieces of legislation created synergies or compensated potential trade-offs in any of them?

- ☐ To a great extent
- ☐ To some extent
- ☒ To a little extent
- ☐ Not at all
- ☐ I do not know

3.4.6 Please provide a brief explanation of your reasons for selecting any of the responses above.

1000 character(s) maximum

3.4.7 Is **the Slot Regulation** coherent with other legislation and policies affecting airports?

	Yes	No	I do not know
* European Green Deal (including Fit-for-55 package)	☒	☐	☐
* The EU Sustainable and Smart Mobility Strategy	☒	☐	☐
* Air Services Regulation (Regulation (EC) No 1008/2008)	☒	☐	☐
* EU competition rules	☒	☐	☐
* EU rules on concessions	☒	☐	☐
* Traffic management rules	☒	☐	☐
* Balanced Approach Regulation (noise reduction at certain airports)	☒	☐	☐
* Aviation security and safety rules	☒	☐	☐
* EU passenger rights rules	☒	☐	☐
* ReFuelEU Regulation (introduction of sustainable aviation fuel to aviation)	☒	☐	☐
* Alternative Fuels Infrastructure Regulation	☒	☐	☐
* International obligations (including Sustainable Development Goals)	☒	☐	☐

3.4.8 Please provide a brief explanation of your reasons for selecting any of the responses above.

1000 character(s) maximum

When the balanced approach regulation or any other reason results in a reduction of airport capacity, the slot regulation could benefit from clear rules on how to address this reductions.

3.4.9 Is **the Airport Charges Directive** coherent with other EU legislation and policies affecting airports?

	Yes	No	I do not know
* European Green Deal (including Fit-for-55 package)	☒	☐	☐
* The EU Sustainable and Smart Mobility Strategy	☒	☐	☐
* Air Services Regulation (Regulation (EC) No 1008/2008)	☒	☐	☐
* EU competition rules	☒	☐	☐
* EU rules on concessions	☒	☐	☐
* Traffic management rules	☒	☐	☐
* Balanced Approach Regulation (noise reduction at certain airports)	☒	☐	☐
* Aviation security and safety rules	☒	☐	☐
* EU passenger rights rules	☒	☐	☐
* ReFuelEU Regulation (introduction of sustainable aviation fuel to aviation)	☒	☐	☐
* Alternative Fuels Infrastructure Regulation	☒	☐	☐
* International obligations (including Sustainable Development Goals)	☒	☐	☐

3.4.10 Please provide a brief explanation of your reasons for selecting any of the responses above.

1000 character(s) maximum

3.4.11 Is **the Groundhandling Directive** coherent with other EU legislation and policies affecting airports?

	Yes	No	I do not know
* European Green Deal (including Fit-for-55 package)	☒	☐	☐
* The EU Sustainable and Smart Mobility Strategy	☒	☐	☐
* Air Services Regulation (Regulation (EC) No 1008/2008)	☒	☐	☐
* EU competition rules	☒	☐	☐

* EU rules on concessions	☒	☐	☐
* Traffic management rules	☒	☐	☐
* Balanced Approach Regulation (noise reduction at certain airports)	☒	☐	☐
* Aviation security and safety rules	☒	☐	☐
* EU passenger rights rules	☒	☐	☐
* ReFuelEU Regulation (introduction of sustainable aviation fuel to aviation)	☒	☐	☐
* Alternative Fuels Infrastructure Regulation	☒	☐	☐
* International obligations (including Sustainable Development Goals)	☒	☐	☐

3.4.12 Please provide a brief explanation of your reasons for selecting any of the responses above.

1000 character(s) maximum

3.4.13 Do you see any incoherence between the current airport legislation (i.e. the three pieces of legislation) and EU legislation and policies other than those mentioned above? Please briefly describe them.

2000 character(s) maximum

3.5 The EU added value (Do the three pieces of legislation provide benefits that could not be achieved at the national level alone?)

3.5.1 Do you agree that the issues addressed by the three pieces of legislation should continue to be regulated at EU level as the same benefits could not be achieved at the national level alone?

	I fully disagree	I rather disagree	I neither agree nor disagree	I rather agree	I fully agree	I do not know
* Slot Regulation	☐	☐	☐	☒	☐	☐
* Airport Charges Directive	☐	☐	☐	☒	☐	☐
* Ground handling Directive	☐	☐	☐	☒	☐	☐

3.5.2 Do you agree that the added value of regulating the issues addressed by the Slot Regulation, the Airport Charges Directive and the Groundhandling Directive at the EU level has increased since the adoption of these three pieces of legislation?

	I fully disagree	I rather disagree	I neither agree nor disagree	I rather agree	I fully agree	I do not know
* Slot Regulation	☐	☐	☐	☐	☒	☐
* Airport Charges Directive	☐	☐	☐	☒	☐	☐
* Ground handling Directive	☐	☐	☐	☒	☐	☐

4 4. Additional information

4.1 If you would like to provide further information or comments related to this questionnaire, please feel free to do so here.

5000 character(s) maximum

4.2 You are welcome to upload a concise document, such as additional evidence supporting your responses or a position paper. Please note that any uploaded documents will be published alongside your questionnaire response, serving as supplementary material to enhance understanding of your position. While this document is optional, it can provide valuable background context.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

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