

23 January 2026

Call for evidence: Traffic Distribution Rules (TDR) 1991

*The European Express Association (EEA) represents the express delivery industry in Europe, comprising **DHL Express, FedEx, and UPS**, and connects European businesses, citizens and communities with swift, reliable next-day delivery across Europe and beyond using various modes of transport. Our industry directly employs 330,000 people and supports over 1 million jobs across our European supply chains. Focused on providing value-added services to our customers, we generate nearly €70 billion for Europe's GDP.*

Revision of the Traffic Distribution Rules (TDR) 1991

International express services form a critical part of the UK's economy. They provide fast, time-definite, door-to-door delivery of high-value and time-sensitive goods, supporting sectors ranging from pharmaceuticals and advanced manufacturing to e-commerce, professional services and life sciences. All-cargo airlines facilitate international trade and support UK economic growth.

However, the 1991 TDRs have imposed significant operational constraints on express services by restricting all-cargo flights at Heathrow and Gatwick during periods that are essential to time-definite networks. These restrictions constitute a barrier to entry for express air cargo operators, which limits the ability of businesses in the South of the UK to access international connectivity and global markets. In line with the UK Government's objective to drive economic growth, the EEA firmly believes that removing the TDRs will boost the UK's economic competitiveness.

In this spirit, the EEA, whose members are also members of AICES, fully supports the submission by AICES (Annex I) to the Civil Aviation Authority's call for evidence in its review of the Traffic Distribution Rules (TDR) 1991.

- The TDRs are outdated and anti-competitive. We encourage the CAA to recommend to the DFT that the TDRs be removed.
- The removal of the TDRs should be accompanied by a review of the Local Rules that govern access to slots at Heathrow and Gatwick and ensure consistency with the Worldwide Airport Slot Guidelines.
- The EEA is raising the same concerns about traffic distribution rules to the European Commission as part of the planned review of Regulation (EC) No 1008/2008 on common rules for the operation of air services in the Community.

With the points made by AICES in mind, the EEA is convinced that the review of the 1991 TDRs is an important opportunity for the UK Government to foster economic growth in the southern, and all regions of the UK.
