

26 June 2026

EEA response to consultation on Traffic Distribution Rules (TDR) 1991

Revision of the TDR 1991: Draft Advice to Secretary of State

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

The 1991 TDR 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 regulatory barrier to entry for express and air cargo operators, which limits the ability of UK businesses, particularly in the South, to access international connectivity and global markets.

The EEA welcomes the UK Civil Aviation Authority's draft advice that the TDR is no longer justified and was introduced in markedly different environment. The EEA agrees that modern regulatory frameworks, notably slot allocation, have evolved significantly and are sufficient to manage scarce airport capacity effectively. The CAA has correctly recognised that cargo operations represent a small proportion of airport activity but generate significant economic value.

The EEA strongly supports the CAA's proposed recommendation to revoke the 1991 TDR in full. The TDR should be removed without undue delay. The EEA therefore supports the proposal in Option 1 of the consultation to revoke the TDR with immediate effect. We would like to add that a TDR removal constitutes a regulatory change and therefore does not require any transition period beyond its administrative implementation.

The removal of the TDR should be accompanied by a review of the Local Rules that govern access to slots at Heathrow and Gatwick to ensure that cargo operators are given fair and non-discriminatory opportunities to access airport capacity and that the revocation of the rule will effectively be implemented into practice. Revoking the TDR will be less effective if Local Rules continue to restrict cargo access in practice, particularly at Gatwick. Equally, it would be important that there are continued safeguards against economic mechanisms that could restrict access for cargo carriers such as excessive and disproportionate airport charges, particularly at Heathrow.

In line with the UK Government's objective to drive economic growth, the EEA firmly believes that removing the TDR will boost the UK's economic competitiveness. The draft advice recognises the substantial economic value generated by cargo operations, including express services, which support UK exports and supply chain resilience.

About the EEA

*The European Express Association (EEA) represents the express delivery industry in Europe, comprising **DHL Express, FedEx, and UPS**. We connect European businesses, citizens and communities with swift, reliable next-day delivery across Europe and beyond using various modes of transport. Our industry 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.*