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## **CAP 3202: Call for inputs – Review of the Traffic Distribution Rules 1991**

Dear Mr. Cherry,

thank you very much for the opportunity to provide input to the CAA's review of the Traffic Distribution Rules 1991 (TDRs 1991) as outlined in your letter dated 18<sup>th</sup> December 2025 on behalf of Lufthansa Group (LHG).

Lufthansa Group encompasses all types of airline business models, such as whole-plane cargo services operated by Lufthansa Cargo (incl. currently 4 Airbus A321F short-/ medium-haul freighters) as well as passenger services with bellyhold cargo operated by Lufthansa Airlines (LH), SWISS (LX), Austrian Airlines (OS), ITA Airways (AZ), Brussels Airlines (SN), Eurowings (EW), Discover Airlines (4Y), Edelweiss (WK) and Lufthansa City Airlines (VL). Lufthansa Group serves more than 300 destinations globally with a fleet of 735 aircraft (incl. 18 intercontinental and 4 short-/medium-haul cargo aircraft).

Lufthansa Group welcomes this review and strongly supports the further alignment of UK slot policy with the Worldwide Airport Slot Guidelines (WASG) to ensure that scarce airport capacity is allocated efficiently, transparently and without discrimination. The TDRs 1991, which were introduced in a very different aviation environment and even pre-date the implementation of the relevant Slot Regulation in 1993, are in conflict with these principles and impose significant barriers to start and develop air cargo services at London's most attractive airports for freight shippers and receivers.

With regards to the Areas in Annex 1 we would like to share the following views:

### **Ad 1)**

- LHG's cargo services today are limited to bellyhold freight on our passenger services (with its volume and weight limitations) because it is impossible to acquire historic rights for whole-plane cargo flights due to the TDRs 1991.

- Lufthansa Cargo has invested substantial capital in the acquisition of 4 A321F whole-plane freighters for intra-European freight services. They see relevant opportunities in serving their customers to/ from LHR with additional whole-plane services. This potential cannot be realized due to the discriminatory TDRs 1991, even if slot series were available. Advantages of a combined bellyhold/ whole-plane cargo operation would be:
  - o Economies of scale – supporting the existing passenger operation with freighter would allow the use of established warehouses, staff, etc.
  - o Customers would only need to deliver/ pick up at one location.
  - o Supporting networks (such as road feeder services) can be better utilized and do not require mirroring of routes from 2 different airports (e.g. LHR-GLA and EMA-GLA truck services).
  - o Quality for the customers could be improved as offloads could be secured on a wider range of flights without transfer to another airport.
  - o Increased competition, where an operator with only narrow-body flights is disadvantaged compared to an operator with wide-body flights to/ from LHR. Allowing whole-plane cargo flights increases the supply and makes the market more competitive.

**Ad 2)**

- Today, the relevance of scheduled air cargo, including especially time-sensitive shipments, has increased significantly due to the prominence of e-commerce and large-volume express freight.
- Demand for air services has outgrown London's airport capacity, making it difficult to secure slots even for ad-hoc operations. East Midlands (EMA) is now handling significant freight volumes but cannot replace LHR due to the lack of direct long-haul connectivity and its proximity to senders and receivers in the London metropolitan area.
- Availability of ad-hoc slots has been greatly diminished over the years. Furthermore, they are unusable for reliable scheduled cargo services that are necessary for high-value express freight services.

**Ad 3)**

- The TDRs 1991 in practice deny whole-plane cargo operators the possibility of applying for and retaining regular slot series (and secure them through historic rights). However, these are essential to make long-term investments in scheduled whole-plane cargo services that customers can rely on.
- LHG therefore does not support the extension or tightening of the TDRs 1991. They must be revoked to further align UK slot regulation with WASG.

**Ad 4)**

- LHG does not see any alternative to the principles of the globally recognized Worldwide Airport Slot Guidelines (WASG) for the efficient, transparent and non-discriminatory use of scarce airport capacity.

**Ad 5)**

- The current UK slot regulation, closely aligned with the Worldwide Airport Slot Guidelines (WASG), has proven to be fit for purpose and should be maintained.
- Any potential future slot reform in the UK should be limited to further align the existing regulatory framework (last significant revision in 2004) with the continuously updated Worldwide Airport Slot Guidelines (WASG), ensuring global compatibility. Local deviations, especially if they discriminate by operator or service type, should be removed.
- The TDRs 1991 have proven to be a source of inequality and have prevented cargo operators from developing new and attractive services for the UK shipping community. Their revocation would eliminate a significant difference between UK's regulatory framework regarding slots and the WASG.

**LHG Recommendation:**

- The TDRs 1991 are outdated, discriminating and thus inconsistent with the Worldwide Airport Slot Guidelines (WASG).
- Revoking the TDRs 1991 would enable the independent coordinator ACL to allocate slots in a service type-neutral fashion, including equal eligibility for historic rights for cargo and passenger operations.

Should you have further questions or wish to discuss our views in detail, we would be pleased to arrange a meeting at your convenience.

Yours sincerely,

Jörg Bauer

Director Airport Capacity and Strategic Slotmanagement, Lufthansa Group  
Member of IATA Slot Policy Working Group (SPWG)  
Member of the Worldwide Airport Slot Board (WASB) that governs the WASG

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