

## **easyJet Response to Review of the Traffic Distribution Rules 1991:** **Consultation on Draft Advice to the Secretary of State**

easyJet welcomes the opportunity to respond to the CAA's consultation on the Review of the Traffic Distribution Rules 1991 and its draft advice to the Secretary of State.

easyJet supports the revocation of the 1991 Traffic Distribution Rules (TDRs). This reflects easyJet's consistent position across all European markets of not supporting TDRs and the view that airlines should have the freedom to determine their own networks based on where passengers want to travel, within a framework that ensures fair and efficient allocation of capacity.

More fundamentally, we do not support the principle of TDRs, as they introduce artificial constraints on how airport capacity is allocated between different types of traffic. Airport capacity at coordinated airports should instead be allocated in accordance with the principles of the Worldwide Airport Slot Guidelines (WASG), ensuring that access is open, transparent and non-discriminatory. The TDRs are not aligned with these principles. By imposing additional restrictions outside the slot allocation framework, they distort how capacity is allocated and used, rather than allowing outcomes to be determined through an established, neutral process.

We therefore support the CAA's proposal to revoke the TDRs. In terms of implementation, easyJet is supportive of a phased approach. A transition period would provide a proportionate and practical means of revocation, allowing airlines and airports to adapt. We also consider that the TDRs should be revoked ahead of any release of significant new capacity. Retaining them risks embedding an outdated and distortionary mechanism into the future allocation of capacity. The approach to allocating any new capacity resulting from airport expansion should be considered separately and be subject to appropriate consultation with industry stakeholders.

More broadly, the Department for Transport is actively reviewing the wider slot policy framework and exploring options for reform. Our position on slot reform naturally depends on how airport expansion will impact future capacity, and we would welcome further clarity from the Government in this regard. To that end, we urge the Government to commence its stakeholder engagement programme on slot reform without further delay. Any proposed changes should ensure that the slot framework continues to function effectively and that capacity is distributed in line with WASG principles.

Finally, it will be important to carefully monitor the impacts of revocation over time. This will help ensure that any unintended consequences, including any potential negative impacts on consumers, are identified early and addressed where necessary through the wider slot allocation framework.