AICES International Express

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AICES Response to 'Call for Inputs – Review of the Traffic Distribution Rules 1991'

Executive Summary

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Foreword

This pre-submission is provided by the Association of International Courier and Express Services (AICES) in response to the Civil Aviation Authority's call for evidence in its review of the Traffic Distribution Rules (TDR) 1991. It brings together operational, geographic and economic evidence from the UK international express sector to support an informed decision to recommend removal of the TDR to deliver efficient and proportionate outcomes for businesses, consumers and the wider economy.

International express services form a critical part of the UK's trading infrastructure. 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. Each year, AICES members move hundreds of millions of international shipments to and from the UK, enabling businesses of all sizes to participate in global markets.

This submission sets out evidence on how express networks actually function, how airport access and geography determine service quality and UK competitiveness and growth, and how the current TDR framework shapes these outcomes.

Background

AICES

The Association of International Courier & Express Services (AICES) is the UK trade association for the international express parcels sector. Express operators provide fast, time-definite door-to-door movement of international shipments, which are tracked and controlled throughout the journey.

Our members import and export over 450 million international shipments to and from the UK each year. These consignments range from legal documents and spare parts to pharmaceuticals and medical equipment, to e-commerce goods. Our model relies on picking up consignments throughout the day, then moving them by road to hubs so they can be shipped overnight to their destination by road or air dependent on the final destination and customer delivery requirements.

Our members include CFL, DHL, DPD, Evri, FedEx, Parcelforce and UPS, in addition to our extensive SME and associate membership.

How the International Express Operating Model Works

International express services operate a highly structured, time-critical hub-and-spoke model, designed to enable reliable, time-definite, next-working-day delivery for businesses and consumers across the UK and internationally. The model is fundamentally different from passenger aviation and from general air freight, and its performance depends on precise coordination across road, air and customs processes.

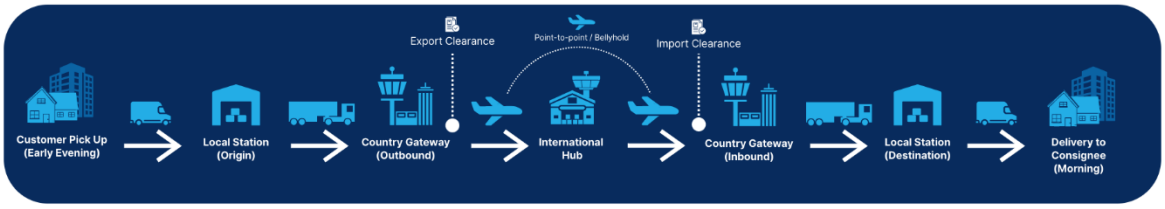

Figure 1: The International Express Operating Model

End-to-end daily operating cycle:

The express operating cycle follows a predictable daily sequence:

1. **Customer collection (daytime to early evening):** Shipments are collected from customers throughout the working day and into the early evening. These include documents, spare parts, medical supplies, pharmaceuticals and e-commerce goods. The latest possible collection time is a critical determinant of service quality for customers.
2. **Road feeder services to local service centres and hubs:** Collected consignments are consolidated at local service centres and transported by

scheduled road feeder services to national or international hubs. These road movements are tightly timed and aligned with downstream aircraft departures.

3. **Customs export processing:** Shipments are processed through export clearance at gateway facilities prior to departure, enabling rapid onward movement without delay at destination.
4. **Overnight air movements (night flights):** Consolidated consignments are flown overnight between hubs and destination gateways. These night flights are the core of the express model, allowing large geographic distances to be covered within a single operating window.
5. **Customs import processing at destination:** On arrival in the early morning hours, shipments are cleared through import customs processes, enabling immediate onward distribution.
6. **Morning delivery to consignee:** Shipments are transferred to destination service centres and delivered to consignees in the morning, often within guaranteed time windows (e.g. pre-09:00, pre-10:30 or next-working-day).

The ability to operate overnight flights is fundamental to this model. Night operations allow express operators to maximise customer collection times at origin while still meeting next-day delivery commitments at destination. Each stage of the operating cycle is time-locked, meaning that even modest changes can materially affect customer cut-off times and delivery reliability.

Airport access, slot availability and proximity to customer catchments directly determine how late consignments can be collected and how early they can be delivered. Policies affecting airport access and capacity, particularly during the night period, therefore have a disproportionate impact on express services and must be assessed with a clear understanding of this operating model and its importance to UK industry and growth.

Importance of Express Services to UK Businesses

In 2023, the Association of International Courier and Express Services (AICES) commissioned York Aviation to conduct research into the importance of international express services to UK businesses.

Express operators provide fast, time-definite, door-to-door movement of shipments which are tracked and controlled throughout the journey. Each year, AICES members import and export over 450 million international shipments to and from the UK. They are highly dependent on night flights to provide this connectivity. The primary purpose of this report is to add further detail to previous economic analysis conducted by York Aviation in 2021 on the impact of night flying in the UK, which showed that flights in the night period (23:00 to 06:59) generated a total economic impact of £16.5 billion in terms of GVA in 2019, supporting approximately 213,200 jobs.

Most of the businesses surveyed use express parcels services every day or at least once a week, with speed of delivery being the most commonly cited reason for using express services. This demonstrates why aviation capacity is so important to express customers & UK businesses.

Key Findings

The York Aviation report highlighted several key findings.

1. **Express services are essential to doing business in the UK**, with 95% of businesses surveyed stating that they were vital to or important for their business operations.
2. **Express services are essential to UK international competitiveness**, with 93% of businesses surveyed saying that express services were very important or important to their competitiveness. 89% said that this was because of speed of delivery and 62% valued reliability of service as integral to their own reputation.
3. **The curtailing of express services would have real implications**. 80% of respondents saying that if express services were not available it would have a serious or very serious impact on their businesses. 68% said that orders could be lost and 42% said that UK operations could be reduced.
4. **Growing demand of express services is expected in the future**, with 49% of companies expecting to use express services more. This demonstrates the need for an increase in cargo and bellyhold capacity, particularly during the night period.

Current Impact of the TDR on UK Express & Cargo Operations

The Traffic Distribution Rules (TDR) were introduced by the UK Government in 1991 under the Airports Act 1986 to manage congestion at London's busiest airports, Heathrow and Gatwick. The rules were designed to control how certain categories of air traffic, particularly non-scheduled services and whole-plane cargo operations, were distributed across the South East airport system, notably Heathrow, Gatwick and Stansted, in order to preserve limited daytime capacity at Heathrow and Gatwick for scheduled passenger services.

Under the TDR, Heathrow and Gatwick are designated as a single airport system, and restrictions are placed on whole-plane freighter operations and general aviation during the main operating day. While this framework reflected the aviation market of the early 1990s, AICES considers that it now creates a material barrier to entry for express air cargo operators at Heathrow and Gatwick and constrains the ability of businesses in the South of the UK to access time-critical international connectivity.

In practice, the TDR impose significant operational constraints on express services by restricting whole-plane cargo flights at Heathrow and Gatwick during the core daytime period (06:00 to 22:59 local time), precisely when flexibility is required to support time-definite networks. The remaining off-peak window (23:00 to 05:59) is itself tightly constrained by Night Quota Period (NQP) limits. This combination leaves express operators with highly restricted access to the airports that are most closely aligned with their customer catchments, international connectivity and service requirements.

The TDRs negative impact on capacity for cargo operations for Gatwick and Heathrow has a direct impact on capacity at other constrained SE airports, particularly Stansted and Luton. Which in turn, damages express operations & UK international competitiveness.

AICES's strong view is that the TDR operate as an anti-competitive policy, favouring incumbent passenger operators and preventing express cargo operators from competing for slots on equal terms. This runs counter to stated Government objectives to deliver better outcomes for businesses and consumers and to support the UK's global trading ambitions, including growth in exports. AICES therefore strongly supports the Government's position to seek advice from the Civil Aviation Authority on the amendment or removal of the TDR and considers that a clear and urgent timeline for removal is required, so that express operators can apply for slots on the same basis as commercial passenger airlines.

The Traffic Distribution Rules do not operate in isolation. At Heathrow and Gatwick, a set of locally applied slot-management and capacity-control rules determine how scarce runway and slot capacity is allocated between different types of traffic. In practice, these Local Rules interact with the TDR in a way that materially reinforces its effects on express

cargo operations. Even if the TDR were amended or removed, these Local Rules would continue to shape which flights can operate, when they can operate, and how they are treated during disruption. It is therefore essential that the CAA considers not only the formal TDR framework, but also the local operational rules that determine access to slots.

Finally, at coordinated (Level 3) airports, airport coordination committees play a central role in shaping how scarce airport capacity is defined, allocated and prioritised. For the express cargo sector, this governance layer is particularly important. As demonstrated in the below sections, express and all-cargo operators hold notably small numbers of slots compared with passenger airlines and they therefore have limited formal voting power within committees that rely on slot holdings as a proxy for market importance. This lack of voting power can result in outcomes that reflect short-term commercial incentives for airports and passenger airlines rather than the wider economic value of time-critical freight connectivity. Without CAA oversight through representation on the airport coordination committees reforms to the Traffic Distribution Rules and slot policy risk being undermined by local decision-making processes that continue to disadvantage time-critical express services.

We welcome the CAA's call for input as the first stage of this review.

Executive Summary

1. This submission demonstrates that the current regulatory framework governing express air services in the South East of England, most notably the 1991 Traffic Distribution Rules (TDR), associated local slot rules and coordination committee practices, places disproportionate constraints on the express parcel sector that operates with a minimal footprint in terms of slots and aircraft movements, yet delivers significant economic, trade and productivity benefits to the UK economy.
2. Across all airports analysed (Heathrow, Gatwick, Stansted, East Midlands, Edinburgh, Belfast, Luton, & Manchester), express and wider all-cargo operations are shown to be marginal in volume terms. Movement data for Winter 2024 and Summer 2025 confirm that passenger operations overwhelmingly dominate activity at Heathrow, Gatwick and other South East airports, with all-cargo movements accounting for only a very small share of total movements, and express representing a smaller subset still. This pattern is consistent across non-TDR South East and regional airports, demonstrating that cargo does not represent a material congestion or capacity risk. Even during peak summer periods, the exclusion of express services from Heathrow and Gatwick cannot be justified on capacity grounds and instead reflects a structural regulatory restriction.
3. Slot data reinforces this conclusion. Express operators hold extremely small numbers of weekly slots at constrained airports, most notably at Heathrow and effectively none at Gatwick, while maintaining modest holdings at other non-TDR airports where access is permitted. These slot volumes are immaterial relative to total airport capacity. In addition, some current slot holdings reflect positioning and recovery movements that arise directly from operating under the constraints of the TDR. Removal of these constraints would allow express networks to be rationalised, potentially reducing inefficient movements rather than increasing them.
4. Where express access is permitted, express services account for the majority of scheduled all-cargo activity. At airports such as Heathrow, Stansted, Luton and East Midlands, express operators consistently represent a substantial share of all-cargo movements across seasons, despite operating with very limited slot footprints. Conversely, at airports where express access is constrained, most notably Gatwick, both express and wider all-cargo activity are effectively absent. This demonstrates that the TDR does not manage congestion proportionately, but instead excludes the most economically productive segment of aviation from key airports.
5. Operational evidence shows that distance to airport is a binding constraint for express services. Analysis of real service-centre and feeder data demonstrates a strong and statistically significant relationship between distance and effective customer collection cut-off times, with over half of the variation explained by

distance alone. Proximity to South East airports enables materially later cut-off times, allowing businesses to complete a full working day before tendering international shipments. Routing express traffic via more distant airports predictably forces earlier cut-offs, reduces access to premium delivery services, and weakens the competitiveness of businesses in London and the South East. Airport substitution is therefore not neutral for time-definite express services, disproving that EMA could be utilised for all express and cargo services with road movements filling the gap.

6. Postcode analysis confirms that express airport catchments are geographically fixed and not interchangeable. Each airport functions as a specialised gateway defined by road distance, feeder schedules and overnight connectivity. South East airports serve the UK's densest concentration of internationally trading businesses, while East Midlands, Scotland and Northern Ireland airports serve distinct and complementary regions. Redistributing express operations between airports would materially degrade service levels, increase road mileage and emissions, and reduce network resilience.
7. Publicly available data also demonstrate the high economic value of goods moved by express air cargo. Airports such as Heathrow, Stansted and East Midlands handle large volumes of high-value trade each year, despite cargo and express movements representing a very small share of total activity. Express services predominantly carry time-critical, trade-enabling goods, including pharmaceuticals, medical devices, advanced manufacturing components, perishable products and high-value consumer goods. Independent evidence shows that UK businesses, particularly in business-to-business supply chains, are highly dependent on express services to support exports, just-in-time manufacturing and supply-chain resilience.
8. International express connectivity converts airport capacity into practical, time-definite access to global markets. Evidence on delivery reach and speed demonstrates near-global market access from the UK within short delivery windows, directly supporting Government objectives on exports, SME participation and economic growth. Regulatory frameworks governing airport access should therefore be assessed not only on movement volumes, but on their implications for trade-enabling connectivity, consistent with the CAA's statutory duty to promote economic growth.
9. Finally, the submission shows that airport coordination committees and local slot rules materially shape access to constrained airports, in some cases as much as the TDR itself. Because governance structures rely heavily on historic slot holdings, express operators are structurally under-represented despite the high economic value of their services. International best practice demonstrates that active regulatory participation in airport coordination committees is normal and effective. Stronger CAA oversight through representation on the airport coordination committee would ensure that the significant benefits of TDR reform are not undermined by local decision-making processes.

10. Taken together, the evidence demonstrates that the TDR and associated regulatory mechanisms constrain a sector that operates with minimal slot and movement requirements while delivering disproportionate economic value. Reform of the TDR, alongside targeted changes to local rules, coordination committee oversight and consideration of night-flying policy, would enable notable, operationally effective improvements in express access that support UK trade, growth and international competitiveness without materially affecting airport congestion or passenger operations.

[End of Submission]

About AICES:

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