

To
Mr Kuldar Leis
Minister of Infrastructure
Estonia

E-mail only

Brussels, 28 May 2025

Subject: Opportunities for meaningful change at the upcoming TTE Council 05 June 2025

Dear Minister Leis,

I am writing to you on behalf of Airlines for Europe (A4E). We represent Europe's 17 largest airline groups, which together account for 80% of European air traffic. A4E member airlines carried over 771 million passengers and 55 million tons of cargo in 2024.

Below you will find our recommendations for the Transport, Telecommunications and Energy (TTE) Council meeting of 05 June 2025.

On passenger rights and Regulation EU 261, we now have the opportunity to agree on meaningful reform that will deliver clearer and more balanced rules that benefit passengers, airlines and the authorities tasked with enforcing them. Europe has been waiting for these reforms for over 11 years. For A4E, this reform must reflect the realities faced today by European airlines and allow us to minimise the impact of disruptions on passengers. Two elements of the reform are essential in our view:

1. Allow airlines to minimise disruption to passengers: a 5-hour delay threshold would give airlines a fighting chance to minimise delays and avoid flight cancellations. Our analysis shows that up to 70% of rescuable flights could be saved, benefitting up to 10 million passengers per year. The proposal for a 3-hour threshold and EUR300 compensation would leave A4E member airlines worse off compared to today.
1. Maintain a balanced non-exhaustive list of extraordinary circumstances: The non-exhaustive list of "extraordinary circumstances" - events or situations beyond an airline's control - is an essential improvement that will bring more legal clarity for passengers, airlines, enforcement authorities and courts alike.

On airspace reform, this Summer air traffic will grow by 5% but this will result in a minimum of 20% more delays than during Summer 2024. This situation cannot continue. 2024 was already the worst summer on record in a quarter of a century. While weather and the current geopolitical situation are contributing factors, the primary causes remain staff shortages and the slow pace of digitalisation of air navigation services which remain unresolved. EUROCONTROL estimates that there is understaffing of at least 5% which led to 2.9 million minutes worth of delay in 2024.

We ask Member States to accelerate efforts to recruit staff and deploy new technologies for air navigation services while also reinforcing cross-border collaboration in airspace management:

1. Increase flexibility for Air Traffic Controllers (ATCOs) to allow them to manage air traffic across borders to mitigate capacity shortages.
2. Harmonise ATCO training and licensing, as well as standardise the equipment and procedures across the industry to allow for a better allocation of resources which will alleviate disruptions.
3. Implement a long-term planning process to increase airspace capacity, in close cooperation between civil and military aviation.

The above proposals have all been highlighted in the Draghi Report and have the potential to boost EU GDP over the next five years by about €80 Billion, prevent 11.6 million tons of CO2 from being emitted and reduce costs by €6 billion.

European airlines remain essential for connecting Europeans with each other and with the rest of the world. The TTE Council meeting next week is an opportunity to deliver long-awaited reform that will improve European airspace, the passenger experience and the competitiveness of European airlines.

Sincerely,



Ourania Georgoutsakou
Managing Director A4E