

EU must maintain a robust Article 20 on air traffic limitations in the Air Services Regulation

Dear Commissioner Tzitzikostas, Commissioner Hoekstra,

Two years ago, the European Commission's implementing decision (EU) 2022/2358 confirmed the French measure establishing a limitation on the exercise of traffic rights due to serious environmental problems. Article 20 of the EU Air Services Regulation is playing a needed role in avoiding projected emissions growth in the aviation sector, in this critical decade for action.

However in the run-up to the revision of the Air Services Regulation, [industry pressure](#) is mounting to severely limit the scope of application of Article 20. **We call upon the European Commission to be coherent in its pursuit of sustainable mobility, maintaining a robust scope for Article 20 in the Air Services Regulation, for three strong reasons.**

1. Further measures to avoid emissions and limit uncontrolled growth are necessary

While Fit for 55 measures are critical for the sector's decarbonisation, [T&E analysis](#) shows that alone they are insufficient. The EU's Scientific Advisory Board has [called](#) for shifting demand from aviation to rail, to align with 2030 and 2050 climate objectives. Targeted flight limitations provide an effective and swift tool for CO₂ mitigation needed to fulfil EU and national targets.

2. A coherent approach to sustainable connectivity must reflect both air and rail

The new EU Sustainable Mobility Strategy high-speed rail plan aims to improve connections and strengthen rail as an alternative to short-haul and even longer flights; priority should go to short to medium-term network upgrades generating rapid, widespread benefits. Limiting flights where cleaner transport modes provide effective levels of service contributes to sustainable connectivity, as well as wise use of public resources and infrastructure.

3. Citizens' expectations and democratic processes must be respected

In France and now in Spain, citizens' initiatives and parliaments identified limitations as an essential short-term action. With [two thirds of Europeans](#) backing legislation banning short-haul flights where high-speed rail alternatives exist, [new research](#) has identified further European city pairs with high potential, based on rail journeys of four to five hours.

The scope for national authorities to take temporary restriction actions was detailed by the European Commission in 2022, giving sufficient clarity for Member States to design compliant actions, without needing prior approval. National consultation and assessment can be conducted in a transparent and effective manner, as in France, without lengthy requirements.

Adding burdensome requirements runs contrary to simplification of regulation. Instead, time must be allowed to draw lessons from experiences in France and Spain, and explore the full potential of Article 20 to help ensure the EU can meet its mobility and decarbonisation goals.

We call on you to ensure that a robust Article 20 is maintained in the EU Air Services Regulation, as a needed tool to contribute to sustainable mobility in this critical decade.

Yours sincerely,

