



ECA Piloting
Safety
European Cockpit Association



**EUROPEAN TRANSPORT
WORKERS' FEDERATION**

Ending Social Abuses in Aviation:

Europe's Aircrew Need a Revised EU Air Services Regulation NOW !

Dear EU Transport Commissioner Vălean,

With this open letter we call upon you to act – and to act now!

Since at least February 2015 (when the 'Ghent Study'¹ demonstrated a massive raise in precarious atypical aircrew employment) it has been clear that Europe's Single Aviation Market has failed to maintain a level playing field, provide healthy competition free of social dumping and deliver decent social standards for the people working in the aviation sector.

Since 2015, multiple EU studies, impact assessments, evaluations, and consultations on the very regulation that governs this Single Aviation Market – the EU Air Services Regulation (Reg. 1008/2008) – have consistently come to the same conclusion: The current Air Services Regulation is outdated and urgently needs fixing.

It needs fixing to stop aircrews' social standards to worsen even further, to ensure legal certainty for crews and authorities, and to end social dumping by unscrupulous airlines.

Despite this pressing situation, Europe's pilots & cabin crew are still waiting for you to issue your proposal to revise this Regulation. 8 years of talking, assessing and consulting have passed since the Ghent Study – and still there is no proposal.

We know that revising this Regulation is a complex exercise. However, the policy options for this revision are known to you for many months – and still there is no proposal.

We also know that revising this Regulation is a key enabler for making aviation more resilient and more sustainable – both socially and environmentally. We need to strengthen Europe's aviation and its strategic role in view of external economic shocks, potential future pandemics and geo-political uncertainties. For this we need a proposal.

Having no proposal presented is simply untenable, and leaves us with an outdated regulatory environment, unable to adapt to the rapidly changing aviation sector. As Europe's Transport Commissioner, you not only have the *right* of initiating new European legislation, but also the *obligation* to do so, if current regulations are failing to deliver.

We therefore call upon you to take political leadership – and act! Act by publishing – no later than May 2023 – a *targeted*² proposal focussed on the *essential* changes necessary to reinforce the *resilience* of our sector and its *sustainability*.

A failure to act would mean accepting the continuation of worsening working conditions, social dumping, and impunity for those who exploit the Regulation's loopholes. And a missed opportunity to strengthen our sector, its resilience and social & environmental performance.

Commissioner Vălean – please Act Now!

¹ '[Atypical forms of employment in the aviation sector](#)' (European Social Dialogue, EU Commission, 2015).

² Parts of the Regulation that have worked so far – such as on foreign country wet-leasing and investments in EU airlines – should be maintained or clarified by non-legislative means.