

## Common Statement on the revision of Regulation (EC) No 1008/2008 Air Services Regulation

We, the Nordic airline pilot associations

Norsk Flygerforbund (NF), Svensk Pilotförening (SPF), Danish Airline Pilots' Association (DALPA), Finnish Pilots' Association (FPA) and Félag íslenskra atvinnuflugmanna (FÍA),  
accompanied by the Latvian Aviation Union (LAU),

recognise that deregulation of European aviation has been positive for the consumers and for European connectivity. We recognise that deregulation across jurisdictions, without a common framework leads to regulatory arbitrage. This arbitrage distorts competition and puts all operators on a trajectory towards the lowest common denominator. This is incompatible with Member States' competence on social matters and national sovereignty to tax and hold accountable to national legislation, operators operating on their territory.

The upcoming revision of Regulation (EC) No 1008/2008, Air Services Regulation, is an opportunity to close the regulatory arbitrage, create a level playing field across European aviation and re-establish clarity between operators and their national social, tax law and labour law obligations.

We are at a crucial juncture for the European aviation industry and its future. No action puts the industry and European jobs at risk; Action can turn the sector from a European story of social and financial despair to a story of a flourishing, resilient and responsible industry.

Our three (3) proposals for the revision to end the social abuses, level the playing field and strengthen the industry's resilience are:

1. Define the term Operational Base and mandate local labour law and oversight.
2. Introduce a Presumption of Employment to eliminate bogus self-employment.
3. Define the criteria for wet leasing for its intended use, no further liberalisation.

A national definition of the term Operational Base has already been achieved in France, has forced social and tax compliance and has been upheld by the judiciary.

A Presumption of Employment has already been introduced in Norway, and has been effectively used to force social compliance with an air operator.

Defining the criteria for the proportional use of wet lease, as a legitimate tool to solve temporary and unforeseen capacity constraints rather than a permanent business model, can halt the deconstruction of effective oversight and reintroduce accountability to AOC holders for their own operations.

Our position paper is attached.

Oslo, 27. June 2025.

