

WIZZ AIR
EU POSITION PAPER

A ULCC Vision for Europe's Aviation Strategy

wizzair.com

FOREWORD BY THE CHIEF EXECUTIVE OFFICER

Europe is preparing its first Aviation Strategy since 2015, with competitiveness as its guiding objective. Wizz Air welcomes this orientation and fully supports it.

The history of Wizz Air is closely intertwined with that of the enlarged European Union. The airline commenced operations in 2004, the year in which ten new Member States acceded to the Union, on the founding principle that air travel should be accessible to all. Since then, our business model has enabled more than 500 million passengers to travel, connecting regions, families, students, workers, and businesses across the Union and its neighbourhood. For many regions underserved by traditional carriers, affordable air travel constitutes an essential means of access to employment, education, family, tourism, and investment. Such connectivity is a cornerstone of the Single Market and cannot be taken for granted.

This connectivity is now under increasing pressure. Airspace congestion persists, airport and air navigation charges continue to rise, and the cumulative cost of carbon and regulatory measures is increasing without commensurate benefit. A framework that penalises efficiency cannot deliver competitiveness.

The decarbonisation of aviation is imperative, and the sector has considerable progress yet to make. Efficiency is its necessary starting point. By operating a young, high-density fleet of new-generation aircraft, Wizz Air has achieved one of the lowest carbon intensities per passenger-kilometre among European airlines. Efficiency alone, however, will not suffice. Meaningful progress will depend on the large-scale availability of sustainable aviation fuels at viable cost, the full implementation of the Single European Sky, and continued fleet renewal. Policy should accelerate these measures rather than merely increase the cost of travel for the citizens who rely on it most.

The forthcoming Aviation Strategy should therefore reward operational and environmental efficiency, establish a climate framework that is both ambitious and economically viable, and strengthen connectivity within the Union and with future Member States, thereby extending to the next enlargement of the Union the benefits that air connectivity brought to the last one.

To that end, this position paper sets out Wizz Air's proposals. Affordable connectivity, global competitiveness, and decarbonisation need not be competing objectives. Pursued together, those can secure the contribution of aviation to Europe's growth and cohesion in the decade ahead. Wizz Air stands ready to work constructively with European institutions in pursuit of these shared objectives.

József Váradi
Chief Executive Officer, Wizz Air Group

WIZZ AIR EU POSITION PAPER: A ULCC VISION FOR EUROPE`S AVIATION STRATEGY

The EU (Union) aviation framework requires targeted adaptation to reflect the evolving structure of the European air transport market, including the growing role of highly efficient, utilisation-driven, ultra-low-cost carrier (ULCC) operators. Regulatory frameworks designed for earlier market conditions increasingly create misalignment between policy objectives and operational realities. The forthcoming EU Aviation Strategy, the first since 2015, offers a timely opportunity to address this misalignment.

European airlines and their passengers face a growing and cumulative burden of regulatory costs arising from carbon pricing, fuel mandates, airspace inefficiencies, infrastructure charges, and national taxation. While individual measures may pursue legitimate objectives, their combined effect is rarely assessed, and it increasingly weighs on affordability, connectivity, and the competitiveness of European carriers against non-Union competitors. The new Aviation Strategy should therefore introduce a systematic competitiveness check for aviation, ensuring that all new European and national legislative initiatives, as well as the revision of existing ones, are assessed for their cumulative impact on the sector and on air connectivity across the Union.

The new Aviation Strategy should reward highly utilised and cost-efficient operations, reduce structural inefficiencies, ensure fair competition, and strengthen preparedness for extraordinary events, thereby enhancing the resilience and competitiveness of the Union air transport market. Such an approach is essential to preserve competitive neutrality across different business models while recognising the contribution of operators that deliver high utilisation and affordable connectivity. These elements are critical preconditions for sustainable and accessible growth, ensuring that aviation continues to serve European citizens and businesses effectively. Wizz Air stands ready to contribute to the development of the new Aviation Strategy and to help ensure that future legislative initiatives promote proportionality, legal certainty, system efficiency, and affordable connectivity across Europe.

POLICY PRIORITIES FOR THE NEW AVIATION STRATEGY

1) AIR PASSENGER RIGHTS AND CONSUMER POLICY

Passenger rights legislation should reflect the realities of a rapidly evolving aviation market, changing consumer preferences, diverse fare structures, and increasingly complex operational environments. The regulatory framework should preserve airlines' commercial freedom to offer differentiated products and ancillary services while ensuring that consumers receive clear, transparent, and predictable information throughout their customer journey.

Wizz Air supports the objective of consumer protection and transparent information. Following the political agreement reached in June 2026 on the revision of Regulation (EC) No 261/2004, the priority should now shift to consistent implementation and enforcement that reflect today's operational realities, including increasing air traffic, infrastructure constraints, air traffic management disruptions, and geopolitical challenges. Implementation should focus on enhancing legal clarity and predictability and reducing unnecessary administrative, compliance, and litigation costs for both passengers and air carriers. At the same time, the framework should preserve consumer choice and the benefits of the EU Single Aviation Market. The ability of passengers to purchase unbundled air travel and pay only for the services they require has been a key driver of affordability and accessibility across Europe. Implementing measures and future initiatives should therefore preserve this flexibility, as restricting it would risk increasing costs, reducing consumer choice, and undermining the competitiveness of the ultra-low-cost model without delivering commensurate passenger benefits.

With regard to passengers with reduced mobility (PRMs), greater alignment in the interpretation, implementation, and enforcement of the applicable rules across Member States would support a more consistent passenger experience while reducing regulatory fragmentation and disproportionate compliance burdens for service providers and operators. Given the complex operational and safety requirements governing PRM assistance, any future review should ensure a practical and

proportionate framework that provides greater clarity for airports, airlines, assistance providers, and passengers alike.

The list of extraordinary circumstances set out in the revised Regulation should be applied consistently by national enforcement bodies, authorities, and courts across Member States, and should fully reflect disruptions that are demonstrably beyond the control of air carriers, including air traffic control restrictions, ANSP capacity shortages, ATC industrial actions, government-imposed airspace closures, geopolitical disruptions, and security-related operational limitations. Responsibility for passenger disruption should be more accurately aligned with the source of the disruption, including stronger performance accountability across the wider aviation ecosystem and an effective right of redress for air carriers against the responsible parties.

The framework should also support greater predictability and resilience during large-scale operational disruptions by introducing clearer procedures for crisis situations and extraordinary network events. Implementation of the revised rules, and any future reviews, should strike an appropriate balance between passenger protection and the operational realities faced by airlines, thereby avoiding measures that increase costs without delivering meaningful improvements in consumer outcomes.

In parallel, the Union should promote greater transparency and accountability across the air travel distribution chain. Online travel agencies (OTAs) and other intermediaries should be subject to equivalent obligations regarding passenger information, refund processing, and communication of service conditions. This would enhance consumer protection while ensuring a level playing field between airlines and third-party distributors. Regulatory requirements should remain proportionate, reduce unnecessary administrative complexity, and support the continued availability of low-fare air travel for European consumers while preserving incentives for operational excellence and innovation.

2) AIRSPACE AND INFRASTRUCTURE

Wizz Air supports the timely and full implementation of SES2+ and SESAR and the data-driven optimisation of air traffic management, which are essential to reduce fragmentation, enhance network efficiency, optimise routing, lower costs and emissions, and ensure sufficient and sustainable capacity for future traffic growth. To fully realise these benefits, the Union should strengthen performance accountability across the air navigation service provider (ANSP) network, ensuring that efficiency, capacity, and environmental targets are consistently delivered across Member States.

The Union should also introduce binding measures to protect overflights during air traffic control (ATC) strikes and improve operational predictability across the network. These should include minimum service requirements for overflights, a mandatory 21-day notice period for strike action, a 72-hour individual participation notice, and compulsory arbitration procedures prior to industrial action. Such measures would safeguard the integrity of the Single Market, preserve passenger mobility, and minimise network disruption, while fully respecting and maintaining the fundamental right to strike.

Airport capacity constraints should be addressed, and slot allocation rules applied, in a manner that enables the efficient use of existing infrastructure and sustainable traffic growth. Capacity management frameworks should remain flexible enough to respond to extraordinary geopolitical, security, or economic disruptions, avoiding one-size-fits-all approaches. On airport charges, the Union should prioritise the effective and consistent implementation of the Airport Charges Directive (Directive 2009/12/EC), ensuring that charges remain transparent, cost-reflective, and subject to meaningful consultation with airport users. Any further changes should be evidence-based, proportionate, and reflect the competitive position of individual airports. Such a balanced approach supports investment in capacity, decarbonisation, and service quality, while avoiding disproportionate cost burdens for airlines and passengers.

The integrity of the Single Aviation Market should be safeguarded against national measures that fragment it. Unilateral restrictions on intra-Union air services, including short-haul flight bans, capacity caps introduced without full application of the balanced approach under Regulation (EU) No 598/2014, and national aviation taxes, undermine the freedom to provide air services and distort competition between Member States. Recourse to Article 20 of Regulation (EC) No 1008/2008, which allows traffic restrictions on environmental grounds, should remain strictly limited, proportionate, and subject to

rigorous Commission scrutiny. The Commission should actively enforce the freedom to provide air services within the Union and ensure that national measures affecting intra-Union connectivity are justified, proportionate, and non-discriminatory.

Particular attention should be given to addressing market power concerns where infrastructure constraints limit effective competition. Further reforms should promote efficiency across the wider airport ecosystem, including the modernisation of the ground handling framework, improved operational coordination between airport stakeholders, and enhanced civil-military cooperation to optimise airspace utilisation and capacity. On border management, it is essential to avoid the segregation of passenger flows, invest in capacity-building, and deploy new technologies that support connectivity, tourism, and seamless travel. The roll-out of the Entry/Exit System (EES) has already caused significant disruption at several external borders; its implementation should be aligned with the realities of tourism growth and rising passenger volumes, ensuring that security objectives are achieved without creating unnecessary operational bottlenecks at Europe's external borders. Infrastructure policy should promote airport competitiveness, operational efficiency, and connectivity across the Union, ensuring that capacity investments, digitalisation initiatives, and regulatory frameworks support the long-term growth, resilience and global competitiveness of European aviation.

3) COHERENT DECARBONISATION

Wizz Air supports the decarbonisation of aviation and recognises that the sector has considerable progress yet to make. The Union framework should balance environmental ambition with economic viability and operational feasibility, prioritising emissions reductions at source. To this end, the interaction between the EU Emissions Trading System (Directive 2003/87/EC, as amended by Directive (EU) 2023/959), the ReFuelEU Aviation Regulation (Regulation (EU) 2023/2405) and CORSIA should be assessed holistically, taking account of the continued scarcity of Sustainable Aviation Fuels (SAF) and e-SAF, their significant price premium over conventional jet fuel, and persistent disparities in fuel infrastructure across Member States.

Operational and fleet efficiency is the most immediate lever for reducing aviation emissions. The Union framework should recognise and reward the emissions reductions delivered by fleet renewal with new-generation aircraft and by high-utilisation operating models, which lower emissions per passenger. Regulatory and operational constraints that generate avoidable emissions, notably the fragmentation of European airspace and unnecessarily burdensome operational procedures, should be addressed in parallel.

SAF prices remain significantly above commercially viable levels, limiting uptake beyond regulatory requirements. Policy measures should support a pathway towards cost parity between SAF and conventional jet fuel, with policy support for scaling up SAF and e-SAF production capacity across the Union. The ETS SAF support mechanism should be strengthened beyond the current allocation of 20 million allowances, and the allocation of this limited support should take account of emissions intensity per revenue passenger kilometre (RPK), so that operators already delivering the lowest emissions per passenger receive stronger incentives to accelerate SAF uptake. The forthcoming review of ReFuelEU Aviation should be aligned with the ETS revision, so that the two instruments jointly narrow the cost gap and ensure a level playing field across the European market.

The uneven availability of SAF across the Union creates significant locational imbalances, with many airports, particularly in Central and Eastern Europe, having limited access to SAF. The Union should therefore ensure full transparency of SAF-related surcharges, require that cost pass-through reflects actual supply, and strengthen competition oversight of airport fuel markets, including non-discriminatory access to fuel infrastructure. To address these imbalances structurally, the Union should introduce a harmonised Book-and-Claim system, supported by a robust Union registry, allowing airlines to purchase SAF where it is produced and claim its emissions benefits across their network. Such a system should be recognised under both the EU ETS and ReFuelEU Aviation, prevent double counting, and ensure that airlines pay only for SAF they genuinely use.

Competitive neutrality should be preserved in the EU ETS revision. The proposed partial extension of the scope from 2029, to flights departing for destinations within 5,000 km of Frankfurt, would apply carbon pricing predominantly to short- and medium-haul routes to Europe's neighbourhood, including candidate countries, while leaving long-haul markets outside its scope. Any change to the geographical scope should be non-discriminatory between markets and business models, and should not undermine the competitiveness of Union carriers against non-Union operators or connectivity with future Member States. Its cumulative impact on connectivity and competitiveness should be fully assessed on the basis of robust evidence and stakeholder consultation.

A substantial share of revenues generated by aviation under the EU ETS should be reinvested in aviation decarbonisation, including SAF and e-SAF production capacity, carbon removals such as Direct Air Carbon Capture and Storage (DACCS), and supporting infrastructure. The Commission's proposal does not currently earmark such revenues for aviation, and this should be addressed in the legislative process. The ETS framework should also include crisis-response mechanisms capable of providing temporary relief during periods of severe market disruption, including exceptional fuel price volatility.

Non-CO_2 effects should be addressed on the basis of robust science. The monitoring, reporting, and verification framework introduced under the EU ETS should be allowed to mature and deliver reliable data before further measures are considered. Any such measures should prioritise proven and safe operational solutions, and should avoid trade-offs that would lead to a net increase in CO_2 emissions.

This holistic approach would maximise cost-effective emissions reductions while safeguarding the resilience, affordability, and connectivity of European aviation.

4) EXTERNAL COMPETITIVENESS AND ENLARGEMENT

Union aviation policy should ensure fair and reciprocal access to global markets, balanced traffic rights, and effective enforcement of competition safeguards against unfair practices by third-country carriers, including under Regulation (EU) 2019/712. Distortive subsidies and discriminatory market practices should be addressed in a timely and effective manner. Air services agreements and the Union's wider external aviation agreements should explicitly prioritise connectivity and open competition and should support the sustainable growth of European airlines.

The competitiveness of Union carriers should also be safeguarded as climate policies evolve. The implementation of sustainability mandates should be regularly reviewed to ensure that compliance costs borne by Union carriers are not materially higher than those faced by competitors operating from third countries, and that traffic is not diverted via non-Union hubs without any environmental benefit. Where competitive disadvantages emerge, corrective measures, including targeted support mechanisms and carbon leakage safeguards, should be considered. For the same reason, further national aviation-specific ticket taxes should be avoided, as European airlines already face significant and increasing regulatory costs.

The ownership and control rules under Regulation (EC) No 1008/2008 play a legitimate role in safeguarding the Union's strategic interests and the integrity of the Single Aviation Market. However, they apply only to airlines, and not to airports, manufacturers, or other parts of the aviation supply chain, and they significantly restrict European carriers' access to global capital at a time of exceptional investment needs for fleet renewal and decarbonisation. In its forthcoming review of the rules, the Union should distinguish clearly between effective control, which should remain in European hands, and passive economic investment by carefully vetted institutional investors, which should be facilitated. Wizz Air supports the principle, set out in the Commission's 2015 Aviation Strategy, of relaxing the rules on the basis of effective reciprocity in Union aviation agreements, with priority given to trusted partners such as the United Kingdom. The review should also provide legal certainty on permissible corporate structures, so that listed European airlines with internationally diversified shareholder bases can operate with regulatory predictability.

Wizz Air advocates closer alignment of aviation policy with the Union's enlargement and neighbourhood agenda. Air connectivity is one of the most tangible drivers of economic integration, labour mobility, tourism, and business links between the Union and candidate countries. The full

implementation and enforcement of the European Common Aviation Area (ECAA) Agreement and of the Common Aviation Area agreements with neighbouring countries, together with the accelerated integration of candidate countries into the Union aviation acquis, should therefore become a strategic priority. This should be accompanied by measures facilitating regulatory convergence, market opening, and infrastructure development, and by the explicit recognition of aviation as a tool for integrating the Western Balkans, Eastern Partnership countries, and other candidate states into the Single Market. EU climate and regulatory measures should be designed so as not to raise the cost of connectivity with future Member States.

As a leading carrier in Central and Eastern Europe, Wizz Air stands ready to play a leading role in restoring and expanding connectivity to Ukraine once conditions permit the safe resumption of civil aviation operations, and has prepared to resume operations within weeks of the safe reopening of Ukrainian airspace. As an airline with a longstanding presence in the region, Wizz Air will work closely with the European institutions, national authorities, airports, and industry stakeholders to support Ukraine's economic recovery, reconnect communities, and facilitate its deeper integration into the European transport and economic area.

5) RESILIENCE, SECURITY, AND WORKFORCE

The new Aviation Strategy should place resilience and operational continuity at the heart of European aviation policy. Wizz Air calls for the establishment of a permanent Union aviation crisis coordination mechanism, supported by pre-agreed emergency procedures, bringing together in a single framework the crisis flexibilities, including on slots, traffic rights, passenger rights procedures, and carbon pricing. These should be capable of rapid activation during pandemics, armed conflict, fuel supply shocks, cyber incidents, and major airspace closures, and should be temporary, targeted, and limited to the duration of the crisis, so as not to restrict competition or market entry. The framework should also allow temporary derogations from specific operational requirements where necessary to preserve connectivity, network stability, and consumer mobility, without compromising safety standards.

The prolonged closure of the airspace of Ukraine and Russia, instability in key neighbouring regions, including the Middle East, and growing disruption risks require a comprehensive assessment of their impact on the competitiveness of European carriers and a coordinated Union response. The Strategy should strengthen fuel security through diversified supply chains, strategic planning for both conventional jet fuel and SAF, and measures safeguarding the resilience of critical fuel infrastructure.

Building on the air traffic management reforms, investment should be prioritised in navigation backup capabilities to address increasing GNSS interference, including jamming and spoofing. Europe's resilience to evolving safety and security risks should be further strengthened through enhanced cybersecurity standards, protection of critical aviation infrastructure, safe drone integration, and robust conflict-zone risk management. In this context, the Union should continue to support the European Union Aviation Safety Agency (EASA) in its central role, ensuring it has the resources and expertise needed to address these emerging challenges.

Digitalisation should be leveraged as a key enabler of resilience and competitiveness. The Union should accelerate the deployment of interoperable biometric solutions, digital identity systems, and seamless digital passenger journeys, while maintaining the highest standards of security and data protection. New digital systems should be introduced without disrupting operations. As the roll-out of the Entry/Exit System (EES) has shown, this requires phased implementation, thorough testing, adequate staffing and equipment at borders, robust contingency procedures, and early coordination with airlines, airports, and border authorities. Future initiatives, including the European Travel Information and Authorisation System (ETIAS), should apply these lessons from the outset.

Addressing structural workforce shortages should become a strategic priority of the new Aviation Strategy. Europe faces persistent shortages of pilots, licensed aircraft engineers, air traffic controllers, and other highly skilled professionals, compounded by an ageing workforce, long and costly training pipelines, and intensifying international competition for talent, with controller shortages in particular translating directly into capacity restrictions and delays. The Union should establish a dedicated European aviation skills and workforce initiative, aligned with international efforts such as ICAO's Next

Generation of Aviation Professionals programme. This initiative should improve forward workforce planning, expand training capacity and access to training finance, streamline licence transfers between national authorities and the conversion of third-country licences while maintaining EASA safety standards, and attract under-represented groups, notably women, into technical roles. These efforts should be complemented by measures to strengthen supply-chain resilience, including engine maintenance capacity, shortages of which have grounded significant parts of European airline fleets.

ABOUT WIZZ AIR

Wizz Air was born alongside the enlarged European Union. Since commencing operations in 2004, the year in which ten new Member States acceded to the Union, the airline has connected Central and Eastern Europe with the rest of the continent, rendering access to the Single Market and the freedom of movement an affordable reality for millions of citizens.

Wizz Air currently operates a fleet of more than 270 Airbus A320-family aircraft from 45 bases, serving over 1,100 routes to nearly 200 destinations in 50 countries. The airline expects to carry approximately 85 million passengers in the financial year ending 31 March 2027. Its workforce comprises more than 10,000 employees of over 105 nationalities.

Wizz Air operates the youngest fleet of any major European airline and, in the 2026 financial year, achieved its lowest-ever carbon intensity, at 50.6 grams of CO_2 per revenue passenger kilometer. Safety remains the airline's foremost priority; for the third consecutive year, Wizz Air has been ranked among the world's ten safest low-cost airlines by AirlineRatings.com.

Wizz Air Holdings Plc is listed on the London Stock Exchange under the ticker WIZZ.



Issued on 28 October 2026

Wizz Air Group

Website: wizzair.com