

A photograph of an airplane's wing and tail section against a clear blue sky. The tail fin is painted with a blue and white striped pattern. The wing is white with dark grey wing fences. The background shows a vast blue sky with some light clouds near the horizon.

Slot Monitoring Guidelines

Edition 2

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1. Introduction — The Purpose of Slot Monitoring

1.1. Legal Basis and Purpose

Slot monitoring is the process by which the Hellenic Slot Coordination Authority (HSCA) verifies that air carriers' planned and published schedules conform to the slots allocated or schedules recommended to them. Its purpose is to safeguard the fair and efficient use of airport capacity at Greek coordinated and schedules facilitated airports.

Pursuant to EU Regulation No 95/93 as amended, Article 4, paragraph 6, the schedules facilitator shall monitor the conformity of air carriers' operations with the schedules recommended to them, and the coordinator shall monitor the conformity of air carriers' operations with the slots allocated to them. These conformity checks shall be carried out in cooperation with the managing body of the airport and with the air traffic control authorities.

HSCA fulfils both roles across the airports under its responsibility: as coordinator at Level 3 (coordinated) airports and as schedules facilitator at Level 2 (schedules facilitated) airports.

The procedures set out in this document are supplementary to EU Regulation No 95/93 as amended, applicable national legislation, and the IATA Worldwide Airport Slot Guidelines (WASG) edition in effect.

This document is subject to amendment in accordance with applicable EU and national legislation, and/or the local regulations of each airport.

1.2. HSCA Principles

In exercising its monitoring function, HSCA applies the following principles:

Transparency and non-discrimination. HSCA applies objective, transparent, and non-discriminatory criteria in all monitoring activities. The same standards apply equally to all air carriers and aircraft operators at all airports under HSCA's coordination or facilitation responsibilities.

Schedule conformity. HSCA's monitoring focuses on whether the air carrier's planned and published schedule conforms to the allocated slot or recommended schedule. Operational variations arising from conditions on the day of operation — such as air traffic control delays, weather, or technical issues — are not in themselves the subject of potential misuse findings, provided the underlying schedule is consistent with the allocated slot.

Individual operational deviations are not immediately considered as potential misuse. However, HSCA monitors operational data for consistent patterns that may raise questions regarding the underlying scheduling practices of an air carrier. Where such a pattern is identified, HSCA will engage with the air carrier to seek clarification. Should corrective action not be taken within a reasonable period, the persistent pattern may be treated as evidence of schedule non-conformity and assessed under the applicable misuse framework.

Dialogue and cooperation. HSCA's objective is to improve slot performance and conformity across all airports under its responsibility. Where appropriate, HSCA will engage with air carriers to discuss identified discrepancies and provide the opportunity for corrective action. Corrective action taken by

an air carrier may be considered as a mitigating factor in determining the level of enforcement, but does not prevent or invalidate a misuse finding. Verified instances of schedule non-conformity may be flagged as misuse.

Air carriers are expected to monitor their own operations and ensure conformity with their allocated slots and recommended schedules, in accordance with the WASG and applicable legislation. The responsibility for conformity remains at all times with the air carrier or other aircraft operator.

For the purposes of efficient communication, it is the air carrier's responsibility to inform HSCA about the preferred or proper email address(es) for monitoring related correspondence.

Proportionality. Where enforcement action is warranted, HSCA determines the appropriate level of enforcement in a proportionate manner, taking into account the nature, severity, and recurrence of the identified misuse, as well as the air carrier's conduct and any corrective measures taken. Where misuse is intentional and repeated within the meaning of the applicable regulation and legislation, enforcement actions shall be applied accordingly. The criteria for determining intentional and repeated misuse are set out in the relevant sections of this document.

2. Commercial Flights

2.1. Monitoring Procedure

2.1.1. Pre-Operation Analysis

HSCA performs conformity checks prior to the day of operation, using data from various sources including but not limited to handling agents, airport operators, and publicly available schedule information.

Where a discrepancy is identified between an air carrier's planned or published schedule and its allocated slot, HSCA will communicate the finding to the air carrier or aircraft operator to allow for review and corrective action prior to the operation.

No sanctions are initiated as a result of pre-operation analysis.

2.1.2. Post-Operation Analysis

HSCA monitors operations based on the data sources set out in Section 2.1.3.

Any identified discrepancy between an air carrier's planned or published schedule and the allocated slot is examined as potential misuse.

Where a discrepancy is identified, HSCA will communicate the finding to the air carrier or aircraft operator. The air carrier or aircraft operator shall reply within **5 (five) business days** with an explanation for the discrepancy supported by evidence, and with any corrective actions planned.

If the air carrier provides sufficient evidence to justify the identified discrepancy, the finding may be resolved without further action.

Where the air carrier does not respond within the specified timeframe, or where the response does not adequately address the identified discrepancy, the finding will be treated as verified misuse. HSCA is not required to pursue further engagement before making such a determination.

Verified slot misuse — whether arising from a single finding or a series of findings — will be assessed for intentionality and recurrence in accordance with the criteria set out in Section 2.2.

Actions taken against verified slot misuse will be communicated to the airport managing body through the Slot Performance Committee.

2.1.3. Data Sources and Evidence

HSCA may use data from the following sources for the purposes of monitoring:

- Actual flight data provided by the airport operator.
- Schedule and handling information provided by ground handling agents.
- Publicly available schedule information (such as airline websites, GDS).
- Flight plan data and ATC records, where available.
- Any other relevant and verifiable source.

HSCA's role is to identify and communicate discrepancies based on available data. The burden of demonstrating that the operation was in conformity with the allocated slot rests with the air carrier or aircraft operator.

2.2. Schedule Non-Conformity and Misuse

2.2.1. Types of Potential Misuse

The following are considered potential misuse of allocated slots:

- Operating a flight at a coordinated or facilitated airport without a corresponding allocated slot or recommended schedule.
- Publishing or scheduling a flight at a time that does not correspond to the allocated slot.
- Using a slot in a manner that differs from the allocation in respect of route (e.g. intra/extra Schengen), service type, or aircraft characteristics (e.g. aircraft type or configuration), without prior approval from HSCA.
- Failing to cancel a slot in advance where the air carrier has no intention to operate, thereby blocking airport capacity.
- Requesting slots without a genuine intention to operate.
- Requesting slots for an operation other than indicated with the intention of obtaining improved priority or a more favorable slot time.
- Requesting false ground times when planned to operate differently.
- Operating with extended ground stops without the required airport approval, in accordance with local rules.
- Not adhering to local coordination procedures in requests via automated means (e.g. repeated cases of unlinked format requests or false flight characteristics to secure slots).

This list is not exhaustive. Any other conduct that may prejudice the fair and efficient use of airport capacity or the integrity of the slot allocation process may be examined as potential misuse.

2.2.2. Intentional Misuse

Misuse is considered intentional where the discrepancy between the air carrier's planned or published schedule and the allocated slot results from a deliberate decision by the air carrier, or from a failure to exercise reasonable care in ensuring conformity. Air carriers are obligated to monitor their own schedule conformity; a failure to do so does not constitute a valid reason against a finding of intentional misuse.

In assessing intentionality, HSCA may take into account, among other factors:

- Whether the discrepancy is evident from the air carrier's publicly available schedule.
- Whether the air carrier was made aware of the discrepancy through pre-operation or post-operation communication and did not take corrective action.
- Whether the nature of the discrepancy indicates a pattern of conduct rather than an isolated occurrence.

- Whether the air carrier provided a reasonable explanation during dialogue phase.

2.2.3. Repeated Misuse

At least two verified cases of misuse by the same air carrier at the same airport during a scheduling season are considered **repeated misuse**.

Where the verified cases relate to the same service, service-specific enforcement actions — including but not limited to the withdrawal of historic rights for that service — are applicable.

Where the verified cases do not relate to the same service but nonetheless demonstrate a pattern of non-conformity by the air carrier at the airport concerned, enforcement actions as set out in Section 2.3 shall apply as appropriate.

2.3. Enforcement Actions

Enforcement actions for verified slot misuse may include, but are not limited to:

1. Revocation of OCS access rights for Greek airports for the airline for an appropriate period when deemed necessary to ensure the integrity of slot allocation procedures (e.g. repeated cases of unlinked format requests or false flight characteristics to secure slots).
2. Referral to the Slot Performance Committee and the Coordination Committee.
3. Lower allocation priority for the next equivalent scheduling season at the airport where misuse occurred.
4. Loss of historic eligibility for the series in question in the next equivalent scheduling season.
5. Withdrawal of the series in question in the current scheduling season.
6. Recommendation to the National Authority (HCAA) for the imposition of financial sanctions, in accordance with applicable legislation.

The above enforcement actions may be applied individually or in combination, as warranted by the circumstances of the verified misuse. The applicable enforcement actions are determined in accordance with the principle of proportionality as set out in Section 1.2 and the criteria for intentional and repeated misuse as defined in Sections 2.2.2 and 2.2.3. Where misuse is both intentional and repeated, enforcement actions shall be applied in accordance with the applicable regulations.

3. General and Business Aviation

3.1. Scope and Applicability

This section applies to all general and business aviation (GA/BA) operations at coordinated or facilitated airports under HSCA's responsibility. Detailed slot allocation rules and procedures for GA/BA operations are published separately in the HSCA GA/BA Rules & Guidelines, available at www.hscagr.gr.

The principles set out in Section 1.2 apply equally to GA/BA operations.

3.2. Monitoring Approach

Since GA/BA operations are not governed by a published schedule in the same manner as commercial flights, HSCA's monitoring of GA/BA operations focuses on the conformity of the actual operation with the allocated slot, including the timing, aircraft characteristics, and any conditions attached to the allocation (such as PPR).

Pre-operation. IFR or IFR/VFR combination flight plans with an initial estimated time of arrival or departure inconsistent by more than 15 minutes from the allocated slot are subject to suspension by the Air Traffic Control Authorities in accordance with applicable agreements between HANSP and Eurocontrol. HSCA's role in this process is to provide accurate slot allocation information and to verify whether any pending requests for the relevant flight may affect the status of the allocation. The 15-minute threshold reflects the operational conformity standard applied to GA/BA movements at coordinated airports.

Post-operation. Where a discrepancy is identified between a GA/BA operation and the allocated slot or schedule, HSCA will communicate the finding to the airline or other aircraft operator, or their representative. The airline or other aircraft operator, or their representative, shall reply within **5 (five) business days** with an explanation for the discrepancy supported by evidence, and with any corrective actions planned.

Where the airline or other aircraft operator, or their representative, does not respond within the specified timeframe, or where the response does not adequately address the identified discrepancy, the finding will be treated as verified misuse.

3.3. Slot Non-Conformity and Misuse by Airlines or Aircraft Operators

3.3.1. Types of Potential Misuse

The following are considered potential misuse of allocated GA/BA slots:

- Operating at a coordinated airport without a corresponding allocated slot.
- Operating at a time that differs from the allocated slot.
- Failing to respect ground time restrictions where applicable.
- Requesting slots for any reason other than an intended flight operation.
- Holding allocated slots with no intention to operate.
- Failing to cancel allocated slots in advance where the operation will not take place.

- Operating at an airport where Prior Permission Required (PPR) is mandatory without having obtained valid PPR.
- Obtaining a slot on the basis of false or fraudulent PPR.

This list is not exhaustive. Any other conduct that may prejudice the fair and efficient use of airport capacity or the integrity of the GA/BA slot allocation process may be examined as potential misuse.

3.3.2. Intentional Misuse

Misuse is considered intentional where the discrepancy between the actual operation and the allocated slot results from a deliberate decision by the airline or other aircraft operator, or from a failure to exercise reasonable care in ensuring conformity. Airlines, aircraft operators, and their representatives are expected to ensure that operations conform to the allocated slot or schedule and a failure to do so does not constitute a valid reason against a finding of potential misuse.

In assessing intentionality, HSCA may take into account, among other factors:

- Whether the airline or other aircraft operator, or their representative, was made aware of the discrepancy and did not take corrective action.
- Whether the discrepancy is consistent with a pattern of conduct by the airline or other aircraft operator. GA/BA slots may be obtained with a flight number (airline code and registration) or with an aircraft registration only. Where operations are conducted under different identification methods, HSCA may trace the aircraft registration to the responsible operator in order to establish whether the discrepancy forms part of a broader pattern of conduct by that operator.
- Whether the nature of the operation indicates disregard for the allocated slot parameters.
- Whether the airline or other aircraft operator, or their representative, provided a reasonable explanation upon engagement.

3.3.3. Repeated Misuse

At least two verified cases of misuse by the same airline or other aircraft operator at the same airport during a scheduling season are considered **repeated misuse**.

Aircraft registration may be used to identify the responsible operator and to link related operations. Where multiple verified cases involve the same aircraft registration, this may be considered an aggravating factor in determining the appropriate enforcement action.

3.4. Enforcement Actions — Aircraft Operators

Enforcement actions for verified GA/BA slot misuse may include, but are not limited to:

1. Referral to the Slot Performance Committee and the Coordination Committee.
2. Reduction of the available request horizon through the Online Coordination System (OCS).
3. Revocation of OCS access rights for Greek airports for the airline or other aircraft operator, or their representative, for an appropriate period.
4. Recommendation to the National Authority (HCAA) for the imposition of financial sanctions, in accordance with applicable legislation.

The above enforcement actions may be applied individually or in combination, as warranted by the circumstances of the verified misuse. The applicable enforcement actions are determined in accordance with the principle of proportionality as set out in Section 1.2 and the criteria for intentional and repeated misuse as defined in Sections 3.3.2 and 3.3.3. Where misuse is both intentional and repeated, enforcement actions shall be applied in accordance with applicable regulation and legislation.

3.5. Misuse by Representatives

3.5.1. Types of Potential Misuse

Representatives acting on behalf of airlines or other aircraft operators interact with HSCA through OCS or via email correspondence. The following are considered potential misuse of the coordination system by representatives:

- Requesting slots for any reason other than an intended flight operation.
- Holding allocated slots for any reason other than an intended flight operation.
- Editing or modifying slots obtained by a different user without authorisation.
- Failing to cancel allocated slots in advance where the operation will not take place.
- Obtaining a slot at an airport where PPR is mandatory without having obtained valid PPR.
- Obtaining a slot on the basis of false or fraudulent PPR.

This list is not exhaustive. Any other conduct that may prejudice the fair and efficient use of airport capacity or the integrity of the GA/BA slot allocation process may be examined as potential misuse.

The coordinator may engage with the representative and the airport operator to exchange information relevant to the identified misuse. Should HSCA deem necessary to communicate directly with the airline or aircraft operator, or the third party entity that delegated the slot allocation to the representative, the representative shall provide the relevant communication details, and failure to do so may warrant appropriate enforcement actions as described in section 3.5.2. The Slot Performance Committee may request a representative to attend the committee where misuse has been observed.

Any case of verified misuse under the representative's responsibility will also burden the airline or aircraft operator.

3.5.2. Enforcement Actions — Representatives

Enforcement actions for verified misuse by representatives may include, but are not limited to:

1. Formal notice of non-conformity issued to the representative.
2. Reduction of the available request horizon through OCS.
3. Revocation of OCS access rights for Greek airports for the representative for an appropriate period.
4. Referral to the Slot Performance Committee and the Coordination Committee.
5. Any other appropriate enforcement action as determined on a case-by-case basis.

4. OCS Access

HSCA provides access to the Online Coordination System (OCS) for Greek airports to facilitate the submission and management of slot or schedule requests. OCS access is granted and administered by the coordinator on an airport-by-airport basis.

HSCA reserves the right to adjust, restrict, or revoke OCS access for Greek airports for any airline or other aircraft operator, or representative, where there is a reasonable basis to do so and it has been deemed that supervision is required to prevent abuse of the coordination system or of the allocation of slots.

Where OCS access is revoked, slot requests shall be processed manually via email in SSIM correspondence standards by the coordinator. Automated message processing during out-of-office hours remains available for requests submitted via email.