



**Keynote Address of the Director of Air Transport (On behalf of the SG) of AFCAC
Harmonization Imperatives in the African Air Transport System
Regional Workshop on Legal and Policy Issues in Aviation Taxes, Fees and Charges –
Johannesburg, South Africa 23 – 25 February, 2026**

Distinguished colleagues from civil aviation, finance and tax administrations, academia, industry, and our valued partners, Ladies and Gentlemen,

Good morning.

On behalf of the Secretary General of the African Civil Aviation Commission (AFCAC), it is my great pleasure, to warmly welcome you all to this Continental Workshop on Legal and Policy Issues in Aviation Taxes, Fees and Charges. Your presence reflects our shared commitment to strengthening Africa's air transport system through cooperation, dialogue, and policy harmonization.

Allow me to express sincere appreciation to our partners, the European Union Aviation Safety Agency and the McGill University Institute of Air and Space Law, for their collaboration in convening this important workshop.

Let me begin with a simple truth: in Africa, where vast geography and limited surface transport networks constrain mobility, air transport is not a luxury, it is an essential lifeline for regional integration and economic development.

It is a bridge between markets that otherwise remain far apart, between families and communities that otherwise remain separated, and between opportunities that otherwise remain theoretical. It enables trade, tourism, investment, and the movement of skills that power economic transformation. Yet, for too many Africans, air travel remains priced beyond reach — treated as a premium product rather than a public-enabling service essential for integration and development

Therefore, air transport service must be accessible and affordable to our citizens and businesses.

That brings us directly to the subject of this workshop: aviation taxes, fees and charges, not as a technical side issue, but as a core question of affordability, competitiveness, and connectivity. Africa remains one of the regions with the highest levels of taxes, fees and charges on air transport. In many markets, these costs represent a significant portion of the ticket price, making air travel less accessible to our people, weakening airline competitiveness, and constraining the growth of intra-African connectivity.



It is therefore essential to address the structure and level of these charges. The elimination of non-aviation taxes and the rationalization and reduction of aviation-related taxes, fees and charges are critical steps toward making air transport more affordable, stimulating demand, and strengthening the sustainability of African airlines.

In this regard, we commend the leadership shown within the ECOWAS region in taking decisive steps toward reducing burdensome charges. This experience provides a valuable model and inspiration for other regions and Member States to pursue similar reforms.

Against this backdrop, let us reflect on three important questions:

- Why is harmonization imperative?
- What does harmonization mean in legal and governance terms?
- How do we move from diagnosis to implementation?

We already know the basic economics. When the cost of air transport rises, demand falls. When demand declines, airlines reduce frequencies or exit routes, connectivity weakens, and unit costs rise further. A self-reinforcing cycle emerges: high charges suppress traffic, reduced traffic increases per-passenger costs, and the system struggles to achieve the scale necessary for efficiency and growth.

But beyond economics lies a legal and institutional reality.

Taxes, fees, and charges are created and enforced across multiple authorities — civil aviation regulators, airport operators, air navigation service providers, ministries of finance, revenue services, and sometimes local governments.

When frameworks differ widely across borders, three things happen:

First, predictability is lost.

Airlines and investors cannot plan networks or pricing with confidence.

Second, comparability is weakened.

It becomes difficult to determine whether charges are cost-related, transparent, or non-discriminatory.

Third, legitimacy is undermined.

Even reasonable charges can generate disputes where transparency and governance are inconsistent.



Harmonisation, therefore, is not merely about reducing charges. It is about building a coherent governance architecture.

And this architecture is essential for the outcomes we all want:

- affordable travel,
- resilient connectivity,
- competitive markets, and
- credible implementation of continental commitments.

Africa has made clear decisions on liberalization and market integration in air transport. The Single African Air Transport Market (SAATM) and the Yamoussoukro Decision (YD) represent a shared political and regulatory direction: liberalization anchored in fairness, transparency, and consumer benefit.

But liberalization is not self-executing. It does not automatically produce lower costs or expanded route networks. If we liberalize market access, but leave the cost environment fragmented and, at times, non-transparent, then the benefits of market opening are diluted. Airlines may possess traffic rights, yet still face route economics that make operations unviable.

This is why addressing taxes, fees and charges is not peripheral to implementation. It is central to it. It is also why this workshop aligns closely with AFCAC's ongoing work programme on affordability and the consultant-led continental study on high taxes, fees, and charges. In collaboration with the European Union and EASA, we have also initiated the development of a continental policy framework on taxes, fees, and charges.

This workshop must help us translate the outcomes of these efforts into legally robust options that can withstand careful review, be domesticated within national frameworks, and be effectively implemented.

Bringing together legal experts, regulators, tax authorities, and academia in such a forum enables us to move from analysis to action.

In this context, when we speak of harmonization, we must be precise. We do not mean a single uniform tariff imposed across 55 States — that is neither realistic nor necessary. Rather, we refer to a shared set of principles, governance requirements, and legal templates that ensure consistency in how taxes, fees, and charges are designed, justified, consulted upon, reviewed, and applied.



A harmonized framework should, at a minimum, embed the following:

First, clarity of legal basis and institutional roles. Every charge must be accompanied by a clear authorizing instrument: a law, regulation, or approved tariff scheme. Responsibilities must also be explicit: who proposes, who consults, who approves, who collects, who audits, and who accounts.

Second, alignment with international guidance and accepted charging principles. In particular, the principles in ICAO guidance on charges and taxation matter because they represent an agreed-upon logic: transparency, cost-relatedness of charges, non-discrimination, and consultation. We do not need to replicate another region, but we do need legal coherence with global norms, especially if we want to build confidence among carriers and investors.

Third, transparency and real consultation. Stakeholders should know what they are paying for, how the amounts are calculated, and what service levels are being funded. Where earmarking is applied, it should be visible and auditable. Consultation must occur early enough to influence outcomes.

Fourth, proportionality and affordability impact assessment. Aviation is a network industry. A charge that looks small on paper can be decisive on a thin route. Harmonized frameworks should require basic affordability and traffic-impact analyses, especially for new levies or major increases.

Fifth, dispute resolution and oversight. Stability requires predictable review mechanisms. These may include independent appeal processes, regulatory review procedures, or competition oversight where relevant.

Sixth, compatibility with regional integration objectives. We have clear continental integration objectives such as enhancing intra-African connectivity; supporting the Single African Air Transport Market (SAATM); facilitating trade under the AfCFTA; promoting the free movement of people; reducing cost barriers to mobility; supporting tourism and cross-border investment; and advancing the goals of Agenda 2063. Charges that unintentionally penalize intra-African travel work against our collective goals. Harmonization, therefore, should help us identify and correct such distortions, while recognizing legitimate State revenue considerations.



Let me say a word about comparative learning — learning, not imitation, but learning with discipline.

One of the most practical contributions of this workshop is the opportunity for comparative learning. The European experience and other regional models demonstrate that you can preserve national sovereignty while achieving a high level of regulatory consistency through common principles, shared legal standards, and robust transparency requirements.

We know that Africa’s context is distinct: different traffic profiles, fiscal structures, infrastructure gaps, and institutional capacities. So, the goal is not to import a model. The goal is to extract the transferable elements: the legal architecture, accountability mechanisms, consultation standards, and methodologies for cost allocation and tariff review. If we do that well, we will give States tools that are both credible and implementable.

Ladies and Gentlemen,

Let me be explicit about **what success should look like** after this workshop. By its close, we should aim to produce:

- **a shared understanding** of the legal and policy principles that should guide aviation taxes, fees, and charges;
- **strategies for a harmonised legal framework** on taxes, fees, and charges that can serve as the basis for model legal provisions adaptable by States — including definitions, charging principles, consultation requirements, approval procedures, publication obligations, and oversight mechanisms.
- **Practical implementation options** that recognises different institutional arrangements: where the civil aviation authority regulates charges, where an independent regulator exists, where ministries approve tariffs, and where airport corporatisation has reshaped governance.
- **and a harmonization roadmap** that can align directly with AFCAC’s affordability initiative and the continental study, including realistic sequencing: quick wins, medium-term legal reforms, and longer-term institutional strengthening.

We must do this in a way that fully includes tax authorities, because fiscal realities matter. If reforms are framed as “aviation versus revenue,” progress will be difficult. A more constructive framing is “**smart revenue within a growth system**”, where sustainable traffic growth expands the revenue base even as distortive charges are rationalized.



Let me conclude by returning to where we began. If air transport is essential infrastructure and service for integration and development, then the rules that govern its costs are not secondary — they are also structural.

Harmonization is the quiet but decisive work that turns our political commitments into practical reality. It is how continental decisions translate into affordable travel for citizens, reliable connectivity for economies, sustainable business conditions for airlines, and accountability for public institutions.

As we engage over the coming days, I invite us to keep one practical question in mind: *What would we advise a State to do on Monday morning when it returns home?*

If our discussions provide clear, legally sound, and implementable answers to that question, we will have achieved something truly meaningful.

I thank you for your attention, and I wish us a productive, rigorous, and action-oriented workshop.

Thank you.