



Open letter to EU member states

Following our previous communications to you, the Professional Staff Organisations¹ (PSOs) would like to take the opportunity to give our views on the ongoing process of the updating of the Single European Sky Performance and Charging Regulations.

As the draft legislation has continued to be developed, and the Performance Review Body (PRB) have set out their final proposals for target setting, the summer has continued, and a clearer picture of just how challenging providing sufficient capacity is, has emerged.

How to recover from a difficult situation?

The scheme needs to stop repeating the mistakes of the past. The current increase in delays is mainly due to the short-sighted nature of the performance scheme and the constant re-prioritising between cost and capacity every few years.

The current PRB proposals for target setting and the last European Commission proposal on RP3 legislation leaves PSOs exasperated. We seriously question how these PRB recommendations and EC proposals can contribute to solve the current problems and to allow the safe and efficient flow of traffic in the European ATM system.

This summer, in extremely challenging circumstances all ATM staff tirelessly gave their utmost to make the system perform as well as possible.

In July 2018, Commissioner BULC, and K DELLI, Chair of the European Parliament TRAN committee produced a joint statement on European Aviation: *“No more delays, the time for action is now!”*² This urgent call for action promotes co-operation and states the need for the system to be urgently upgraded. However contrary to this, what is offered by the EC and PRB is more political and economic pressure within a stringent legislative framework. For PSOs, this is the wrong approach and will not deliver the necessary improvements. Without appropriate financial support, what can be reasonably expected? The PSOs would suggest that strong communications such as this must be turned into *appropriate* and more *enabling* decisions and policy.

To recover from the current situation an agreed comprehensive plan with more resources in people, technology, and the building of necessary buffers to absorb short term variation in airspace user behaviour is required.

The current proposals just deliver more of the same. Increased risk to ANSPs from traffic risk sharing and incentives do nothing to improve the situation. They just promote short termism and gaming. Co-operation between ANSPs, airspace users and the Network Manager (NM) should be promoted, recognising the legitimate right for existing entities and Member States ANSPs' to continue to exist. A proper examination of the current route charging framework should be commenced without delay. This is largely the causal issue in hampering performance improvement.

¹ The ATM PSOs are ATCEUC, ETF, IFAIMA, IFATCA, and IFATSEA.

² <https://ec.europa.eu/transport/sites/transport/files/2018-07-13-joint-statement-improving-european-airspace.pdf>



What to do after the recovery plan?

The amended regulation needs to provide for rapid and comprehensive capacity improvements. Lessons have to be learned to properly envisage the medium term. If we look back historically, we can draw conclusions that the performance scheme is too widely influenced by the airspace users, and their short-term business planning and one size fits all approach. Whilst it is accepted that this is a necessity of their business model, it is completely incompatible with that of the ANSPs.

The Performance and Charging Scheme needs:

- A focus on the long-term trend of the ATM sector by **giving the ANSPs the tools, and resources needed to develop a fit for purpose and long-term viable ATM system** for Europe.
- **A de-coupling of the scheme from the whims of the airspace users.** The ATM system is infrastructure which needs a long-term and stable strategy to improve.

European aviation must learn how to preserve its own sustainability and needs to better take advantage of slack times in the economic cycle to:

- Ensure the ATM system is ready for the upturn in traffic and future growth, particularly after a period of economic uncertainty. This means building margins and buffers.
- Focus on the technical solutions that are currently available and are not being implemented.
- Allow ANSPs to invest and ensure they have the economic and resource capacity to do so.
- Encourage renovation of all ATM/ANS infrastructure across Europe towards harmonised technological capabilities. This will lead to common procedures, enhanced interoperability and thus enabling the seamless operation of ATM system, increasing capacity without jeopardising safety.

Considering the disconnect between the call for bold initiatives and improvement, and the completely inappropriate PRB / European Commission RP3 proposals, the PSOs can only now express their deep scepticism and disappointment about the lack of ability at EU level to transform the current situation in to a fit for purpose ATM system for the future.

An urgent action plan is needed, with 2 fundamental pillars: providing sufficient safe capacity for summers 2019-2021 and recruiting sufficient Air Traffic Controllers, ATSEPs, needed for the implementation of SESAR technologies while maintaining legacy (existing) systems, and other expert ATM staff. This has to be properly supported by an appropriate performance framework that allows this to happen.

The PSOs turn to EU members states and call for them to be the guarantor of the integrity of the EU aviation sector by pushing for a swift and comprehensive recovery plan for the ATM industry and properly preparing for the medium-term future, involving *all* stakeholders.

We would urge member states to reject the current proposals.

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