



"[air navigation control, [...] is a task involving the exercise of public authority and is not of an economic nature, since that activity constitutes a service in the public interest which is intended to protect both the users of air transport and the populations affected by aircraft flying over them".
(Extract of decision C.364/92 of the European Court of Justice).

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Comment on the "Proposal to amend common rules for the allocation of slots at European Union airports ('Slot Regulation')"

ATCEUC represents the ATC/ATM Operational staff of the European ANSPs. While we fully understand the reasoning behind regulating the slot-waiver for the winter 2020-2021 season, it seems to us that the proposed Regulation is exclusively focused on the Airspace Users' needs and we believe one important aspect has not been given sufficient consideration in the Roadmap: the impact of this Regulation on the provision of ATS, mainly but not only ATM/ATC, and costs of this provision.

The provision of ATM/ATC requires highly specialised, skilled and continuously trained operators. This high specialisation, expressed by the requirements of Reg. 2015/340 on ATCOs License in term of "Ratings", "Ratings Endorsement" and "Unit Endorsement" is the key to the high safety-score the European ATM System produces year after year. At the same time, it impacts on the flexibility of ATCOs' work.

The opening of ATC sectors with the right number of operators and infrastructure (e.g. radar screens and frequencies) has to be planned with regards to the AUs' seasonal plans and given adequate time. After the deployment of seasonal plans, the planned sectorisations can only really be fine tuned

For this reason, while ATCEUC welcomes the *"Airlines and Airports agreement on the conditions for European winter slots waiver"*, we must underline that ANSPs have not been included in those talks.

The Aviation Ecosystem is composed of different actors, but the three main ones being, Airspace Users, Airports and ANSPs. ANSPs are currently suffering a heavy liquidity crisis and they must not be blamed, in the

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future, for costs of services planned to be provided but not used by airlines if those are allowed to cancel flights without consequences.

ATCEUC urges the EC to consider the aviation sector holistically with each action it considers and to find a fair, supportive model that covers all of the aviation stakeholders and not only the Airspace Users.

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