



"[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).

www.atceuc.org

secretariat@atceuc.org

Open Letter to the Permanent Representations of the Member States to the EU and to the Members of the Single Sky Committee

Brussels, 5 July 2021

Dear Sir/Madam,

ATCEUC acknowledges the Commission Implementing Decision nr. 2021/891 of 2 June 2021 setting revised Union-wide performance targets for RP3 in the light of the ongoing COVID crisis and hereby shares its view of the process and its final results.

ATCEUC observes that the final targets in the Key Performance Area of Cost-Efficiency are quite far from what the PRB has advised the European Commission (EC) to submit to the Single Sky Committee (SSC) on its 78th meeting. Furthermore, we also remind you that the EC was unable to submit an acceptable proposal not only during the entire 78th SSC meeting but also during the informal SSC meeting held on the 16th of April 2021.

The approved targets are less harmful to the European ATM System and ATCEUC praises the Member States' Representatives for their engagement with the sector and their commitment to safety in the Single European Sky. It is a positive sign to see the States taking actions to protect the entire European community.

Unfortunately, the same cannot be said about the EC: ATCEUC has pointed out in the past that EC's intentions seem to be biased regarding the safety-focused infrastructural ATM Sector, taking every opportunity to impose irrational cost-cutting measures that only favour the airlines' profit-based market. Using the COVID-19 crisis to severely endanger the financial stability of the European Air Navigation Service Providers (ANSPs) is the latest and scariest sign of it. We will continue to raise the alarm when assessing future proposals from the EC, unless there is a reversal of its biased approach.

ATCEUC observes the difference between the initial proposal from the EC and the Member States' approved targets as an obvious proof that the PRB and the

ATCEUC ASBL C/O MERITIUS, 431, Avenue Georges Henri, 1200 Brussels, Belgium (judicial area of Brussels)
VAT number BE 0684.488.814

ACV TRANSCOM / CSC TRANSCOM (Belgium) - ATCTUA (Ukraine) - ATCU (Serbia & Montenegro) - ATSR (Romania) - BATCU (Bulgaria) - BHATCU (Bosnia and Herzegovina) - BGATC (Belgium) - CATCU (Croatia) - CYATCU (Cyprus) - DATCA (Denmark) - FATCA (Finland) - GATCA (Greece) - GdF (Germany) - GLCCA (Luxembourg) - HelvetiCA (Switzerland) - IATCA ATC Branch Fórša (Ireland) - ICEATCA (Iceland) - ITUATC (Serbia) - LATCA (Lithuania) - MATCA (Malta) - MATCU (Republic of North Macedonia) - NATCA (Norway) - SINCTA (Portugal) - SNCTA (France) - SPKTA (Albania) - SSKL (Slovenia) - TUEM (EUROCONTROL) - UnICA (Italy) - UNICON (Kosovo) - USCA (Spain) - VLNG (The Netherlands) - ZZKRL (Poland)



EC are too far from reality when assessing the fundamentals of the ATM Sector, its needs and its ability to cope with the ongoing crisis.

ATCEUC invites the members of the PRB and the members of the DG MOVE Single European Sky Unit to acknowledge the obvious lesson from this process and to finally listen to the ATM Personal Staff Organizations and ANSP's Representatives in the future, when suggesting fundamental changes. As front-line operators in ATM, representing both ATCOs and ATSEPs, we know first-hand what needs to be done or to be avoided in our sector and we are also the first to realize when the required conditions for safety are not met.

Kind regards

ATCEUC President
Volker Dick

KPA	Proposition / Result	2019	Proposition / outcome	2020	2021	2022	2023	2024
STATFOR Sc2		125		109		87	102	116
Environnement	PRB	2,60%	PRB	2,36%	2,32%	2,32%	2,32%	2,32%
	Achieved	2,95%	Appeal vote	2,37%	2,37%	2,40%	2,40%	2,40%
Capacity (delay in min/flight)	PRB	0,5	PRB	N/A	0,5	0,5	0,5	0,5
	Achieved	1,66	Appeal vote	N/A	0,35	0,5	0,5	0,5
Cost-efficiency (in B€)	PRB	6,2	PRB	10,6		5,3	5,3	5,3
	Achieved		Appeal vote	12,03		5,83	5,95	6,01
Safety			Targets unchanged					

Air Traffic Controllers European Unions Coordination (ATCEUC) was created in 1989 and is currently composed of 32 professional and autonomous trade unions representing more than 14000 Air Traffic Controllers (ATCOs) and Air Traffic Safety Electronics Personnel (ATSEPs) throughout Europe. ATCEUC is part of the "European Union Sectoral Social Dialogue - Civil Aviation" in the air traffic management field and it is recognised as a full member of the ICB. ATCEUC with its experts participates in every work group where the voice of its Members can and have to be expressed: SESAR JU, TSG, EGHD, EASA STeB, EASC, ASPReT, ATM Partners and other workshops or programmes within the framework of EUROCONTROL and the European Commission.