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**Lack of training and competency requirements in Air Traffic Services**

Dear Commissioner Vălean,

we, the Trade Union EUROCONTROL Maastricht -**TUEM**- and the Gewerkschaft der Flugsicherung -**GdF**-, the Air Traffic Controllers European Unions Coordination -**ATCEUC**- and the European Transport Workers' Federation -**ETF**- want to draw your attention to a lack of training and competency standards in European Air Traffic Management for certain ATS Specialists, which needs to be addressed as soon as possible. In Europe, we have around 5850<sup>1</sup> ATS professionals (non-ATCOs and non-ATSEP staff) working in the operational environment in Air Traffic Services. They perform various safety related or safety critical tasks actively participating in the ATM process. While these ATS Specialists in some cases are regulated under national regulation or internal rules, many are left without any regulation at all. Therefore, the current legislative landscape for those functions is very fragmented or not existent. To be in line with the European Union's vision on Single European Sky (SES)<sup>2</sup>, these ATS Specialists and the Air Navigation Service

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<sup>1</sup> ACE Benchmarking Report May 2023 Edition - Performance Review Unit (PRU) - May 2023 – page 74 – ATC Assistants and OPS support (1846 + 4004 = 5850 staff)

<sup>2</sup> REGULATION (EC) No 549/2004 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL - laying down the framework for the creation of the single European sky (3) March 10th, 2004.

Providers (ANSPs) need clarity and uniformity in terms of training and competence requirements to contribute to the air traffic system at the highest level of safety. An amendment to clarify the mandate given to EASA to regulate competence of ATM/ANS staff with duties affecting safety was introduced in the European parliament when the EASA basic regulation was last revised in 2017. The rationale for its rejection was that it was deemed to already be covered by existing provisions, which is not the case.

Regulating the competence of ATM staff besides ATCOs and ATSEPs has been on EASA's agenda for over a decade and was investigated further in study in 2012<sup>3</sup>. The methodology of this study has been faulty and criticised by members of the ATM sub SSCC, the body advising EASA on ATM regulation at the time. The ATM social partners jointly committed to establish a robust methodology. This was delivered in 2017 with the task safety impact assessment technique (TSIAT) based on the IRiS safety models developed by EUROCONTROL for the SESAR JU identifying the likelihood of the failure of a human ATM operator resulting in an accident or serious incident to inform the need of training and competence requirements. In many discussions on social or ATM platforms<sup>4</sup> over the past year, most of the relevant ATM organisations in Europe also acknowledge that the current regulation falls short in setting training and competency requirements for ATS staff<sup>5</sup> accessing the most sensible data in the European ATM Network.

Therefore, we initiated a project called ATOS – Air Traffic Services Operations Specialist – to unify different ATM/ANS functions<sup>6</sup> under one term and by implementing CBTA (competence based training and assessment) requirements to bring clarity and increased safety standards in European legislation. Our proposal is to first implement a standardised basic/initial training and competency model for ATM/ANS Specialists<sup>7</sup> falling under the scope of the Implementing Regulation 373/2017 to populate its Annex called Part PERS for “staff training and competency requirements.” The second step is to add the term ATOS to the mentioned regulation and define the functions associated with it. In a third step, we would offer to co-draft with relevant stakeholders Guidance Material (GM) and/or Applicable Means of Compliance (AMC) to recommend training and competency specifications for functions covered under ATOS in a flexible approach allowing

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<sup>3</sup> 2013 – „Study on safety-related and safety-critical functions and related jobs in ATM/ANS” by ECORYS – Client EASA – Rotterdam – Version D7: Final Report

<sup>4</sup> FABEC Social Dialog meeting Brussels 17.10.2023, EUROCONTROL Director EGSD 13.02.2023, and within ATCEUC and ETF

<sup>5</sup> Non-ATCO and non-ATSEP

<sup>6</sup> ATM Functions such as Flow Coordinators (FMP); Flight Data Specialists (FDS), Clearance Delivery (DEL), Flight Information Service Officers (FISO), Aeronautical Information/Management Services (AIS/AIM), Air Traffic Services Reporting Offices (ARO), Airspace Management Specialists (ASM) and AMS (Apron Management Services)

<sup>7</sup> Not covered under the ATCO or ATSEP regulation

Member States to decide to opt out of recommended practices giving grounds for EASA to question the level of safety achieved with their own competence schemes. With this approach, we ensure that ATM/ANS Specialists are properly defined, trained, and qualified within their function(s). A standardised ATOS basic/initial course and a function-specific course on unit level and/or in training organisations would be beneficial to the Air Navigation Service Providers (ANSPs) as it would increase their flexibility to adjust the training for each function according to their individual task requirements and enlarge the market of employment.

The future traffic growth, the implementation of new enhanced systems, and the social aspect of a recognised professional group are valid reasons for the implementation of a long overdue training and competency requirement for ATS Specialists. With ATOS, we harmonize the last fragmented group in ATS and bring more attractiveness to those functions. The Air Traffic Controllers European Unions Coordination (ATCEUC) and the European Transport Workers' Federation (ETF), multiple individual unions and professional associations, and even some Air Navigation Service Providers (ANSPs) are ready to move ahead and close the legislative gap to set the highest standards in Europe. While we have heard that SES2+ has finally been settled in an agreement we welcome, we think there is still room for action by the Commission to clarify that EASA is tasked with taking the necessary measures to ensure robust training and competence requirements for ATM/ANS staff. We therefore ask for your support for this initiative and adding the necessary urgency to find an effective solution to close this training and competency gap and regulate the last professional group<sup>8</sup> within the core part of the aviation system.

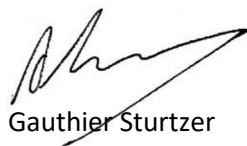
We are looking forward to hearing from you.

Kind regards,



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ATCEUC



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Stefan Pille

President TUEM



Oliver Wessollek

President GdF

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<sup>8</sup> NPA 2023-01 "Training requirements for flight operations officers and flight dispatchers" closes the last gap in legislation for airlines.