



September 18, 2026

To: Ms. Maria De Las Flores Díaz Pulido, Head of Unit Single European Sky (MOVE.E.3), European Commission

Subject: European Commission support for the recognition of emerging ATSEP and operational supervisors in ATS ops, competencies.

Dear **Ms. Díaz Pulido**,

On behalf of ETF, ATCEUC and IFATSEA, we would like to draw the Commission's attention to the urgent need for the timely recognition/identification and development of emerging Air Traffic Safety Electronics Personnel (ATSEP) professionals' competencies, particularly in view of the rapid digitalisation of ATM and the introduction of AI while also considering the role and evolving competencies of operational supervisors in ATS operational rooms.

European ATM is undergoing profound transformation through the Digital European Sky, SESAR, and the evolution towards the future European ATM architecture, including the CP1 and CP2 implementation phases. These developments will increasingly rely on cloud-based services, virtualization, service-oriented architectures, AI, automation and enhanced cybersecurity requirements such as Part-IS and NIS2.

Europe's Digital transformation of ATM will depend not only on technology, but also on the people who operate, maintain and assure these increasingly complex systems. However, the competencies required by the responsible technical and operational personnel have not evolved at the same pace.

Ensuring that ATSEP and operational supervisors in ATS ops competencies development keeps pace with evolving operational requirements is therefore essential to maintaining safety, resilience and operational continuity across the European ATM network.

Recent work and discussions within CEGHD, with ATM and cybersecurity experts, identified a growing operational readiness gap. The evolution towards a distributed ATM Functional System, together with the implementation of CP1 and CP2 and the emerging SESAR architectures, requires ATSEP competencies to evolve accordingly. ATSEP professionals must be considered an integral part of this transition from the earliest stages of system design, deployment and validation through to operation, maintenance, monitoring and lifecycle assurance.

This is a question that goes beyond only cybersecurity compliance, as Part-IS and NIS2 have strengthened cybersecurity governance, and significant guidance, training, and good practices already exist. The challenge is increasingly one of implementation by translating these requirements and software tools into consistent operational capability across ATM organisations.

ATSEP professionals are the first to identify abnormal CNS/ATM system behaviour and, during technical or cyber-related incidents, increasingly act as the interface between the technical, cybersecurity and operational domains, including cross border coordination, as well as interaction with national Security Operations Centres and external service providers.

The role of operational supervisors in ATS operational rooms should also be explicitly recognised in the context of cyber-related incidents. During a cybersecurity incident or cyber-induced degradation of ATM services, they provide a critical operational interface between air traffic controllers, ATSEP professionals, cybersecurity functions and ATM management.

The evolution towards a distributed ATM Functional System alongside SESAR Joint Undertaking AAS architectures also requires ATSEP competencies to evolve accordingly.

This should include competencies on operational cyber-resilience, management of cyber-induced degradation, cloud and virtualised ATM architectures, cross-layer troubleshooting, coordination with cybersecurity functions and external providers, and operational continuity and recovery. These competencies have not been included in ATSEP training curricula yet and this may constitute a showstopper to the implementation of the Digital European sky and AI. A full list of the proposed competencies is provided in Annex 1.

Operational supervisors in ATS operational rooms also require appropriate awareness and practical competencies to recognise and manage the operational consequences of cyber-related events, including service or data unavailability, loss of automation or communications, dependencies on external or cloud-based services, and transition to contingency or degraded modes of operation.

Regular practical contingency exercises between ADSPs and ATSUs involving ATSEP professionals, supervisors in ops and ATCOs must also be an integral part of this approach, covering scenarios such as cyber-induced degradation, loss of services, cross-organisational dependencies and recovery of ATM services.

ETF, ATCEUC and IFATSEA believe that the European Commission, together with EASA and relevant stakeholders, should support a coordinated European approach to draft and translate the necessary competency requirements, knowledge and tools into practical operational preparedness.

A focused European initiative on technical and operational cyber capability could provide a pragmatic way forward, bringing together competency development, training, practical exercises, operational roles, coordination, and recovery arrangements. This is particularly important given the current geopolitical environment and the increasing exposure of critical infrastructure to cyber and hybrid threats.

A European approach should also consider the new corresponding competencies required by ATCOs and, in particular, Operational Supervisors in ATS operational rooms, who have operational responsibility during degraded and contingency situations. The vast majority of Operational Supervisors in ATS operational rooms are air traffic controllers holding a valid ATCO license. However, their specific training, roles, responsibilities and competencies should be considered specifically in the context of cybersecurity, given their operational responsibilities and the critical role they may play in managing the operational consequences of cyber-related incidents.

Recent discussions within the CEGHD suggest that dedicated EASA AMC/GM could offer a practical means of supporting ATSEP competency in the near term, complementing the development of ATSEP-specific regulatory provisions as a medium-term objective, through amendments to Regulation (EU) 2017/373.

A broader Commission-led initiative to tackle these issues could therefore provide a practical and timely means of making progress without waiting for another lengthy regulatory cycle.

ETF, ATCEUC and IFATSEA would welcome the opportunity to discuss these matters further and to contribute constructively to any initiative aimed at strengthening Europe's ATM operational resilience and ensuring that its workforce is prepared for the environment it is being asked to operate in.

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Jean-Denis Larrère
President of ATCEUC

A stylized black ink signature of Gauthier Sturtzer.

Gauthier Sturtzer
Chair ATM ETF

A stylized blue ink signature of Costas Christoforou.

Costas Christoforou
IFATSEA Director Europe

ANNEX 1

Areas of implementation and ATSEP Competency improvement

Areas where competence development is becoming particularly important include:

- Operational cyber-resilience and management of cyber-induced degraded modes;
- Virtualisation, cloud and service-oriented ATM architectures;
- Cross-layer troubleshooting and awareness of digital infrastructure;
- Coordination with cybersecurity functions, Security Operations Centres, cloud providers and other external service providers;
- Operational resilience, continuity, and recovery in distributed environments; and
- Understanding digital service dependencies and interactions within the ATM Functional System.

ETF, ATCEUC and IFATSEA respectfully invites the European Commission to work with EASA and relevant stakeholders to:

1. Strengthen operational capability created by digitalization, cybersecurity and cloud-based ATM systems.
2. Support a coordinated European initiative on technical and operational cyber capability, focusing on practical implementation, ATSEP competence development, training, exercises, roles, coordination, and recovery.
3. Initiate the progressive development of guidance and competence frameworks addressing emerging ATSEP and other ATM operational competencies.
4. Ensure that EASA rulemaking, Digital European Sky, SESAR and Functional System developments systematically integrate operational and technical expertise, including ATSEP professionals, from the earliest stages.
5. Encourage EASA to establish a clear roadmap for the progressive incorporation of emerging competencies into appropriate regulatory, guidance and training frameworks.