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## **SOCIAL DIALOGUE IS NEEDED MORE THAN EVER TO BUILD THE SINGLE EUROPEAN SKY!**

Following the first round table discussions on the future of the Single European Sky on 28 May 2019 and the report of the Wise Persons Group (WPG), please find below follow up comments on behalf of the ETF with respect to those discussions and the WPG report.

Overall, we are disappointed that the ETF was not involved at all in the works of the WPG despite the fact that we represent 30.000 employees (in all categories of ATM staff: ATCOs, ATSEPS, AIS, administrative staff).

In addition, there has been little involvement of staff in the recent work involving the evolution of SES:

- Although there was a consultation process for the Airspace Architecture Study (AAS), our inputs were not properly considered. Some concepts such as ADSP bring many social consequences that were not discussed at all.
- Regarding the WPG, all ATM social partners from the employee side are quite critical towards the report. This again is further evidence that the Commission is not adequately considering the expertise of the ATM workers that is available, and it is the daily front line workers that are most aware of the problems the ATM industry is facing today.

There is an unhealthy culture emerging that is suggesting that the recommendations cannot be challenged, and are taken by default as correct. This is a dangerous assumption. Healthy, constructive challenge and exchange of ideas (which ETF strives to provide) can only help to strengthen any proposals going forward.

Finally, the approach followed by the WPG totally ignores the importance of the social dialogue in the EU policies and mechanisms to be implemented. Without a qualitative social dialogue, that allows management and unions to find joint solutions at all levels, including at EU level, any policies or recommendations will encounter concrete difficulties in the definition and implementation phases.



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WPG recommendations:

*Recommendation 1: Confirm and strengthen EUROCONTROL's Network Manager role by providing it with the necessary executive powers to manage the ATM network, including by managing European capacity and infrastructure based on standardised technology, while ensuring a clear division of responsibilities between the Network Manager and ANSPs*

It is unclear what are the kind of executive decisions that the NM would be allowed to take in the interest of the network. The NM fundamentally has a role to guarantee a maximum level of safety in European airspace, by ensuring sectors are not overloaded.

There is a total lack of work on the interdependencies between capacity and the safety; today's capacity is defined to offer the maximum level of safety; creating penalties in case of underperformance is an incentive to reduce the level of safety.

It is unclear how the States will react to the NM 'mandating' measures, and how they will be forced to comply. It will most likely be unacceptable to States and ANSPs that the Network Manager can dictate to them various measures, particularly where this has revenue impacts. It is also imperative that flexibility is maintained and that local knowledge is not lost. Often centre supervisors and local Network Management positions will have a much greater level of understanding of the operations of their airspace than the NM in Brussels.

*Recommendation 2: Fully integrate airports into the network on the basis of linking the Network Operations Plan and Airport Operation Plans, using extensive Collaborative Decision Making.*

The ETF supports this recommendation.

*Recommendation 3: Implement a Digital European Sky based on an agreed roadmap building on the recommendations described in the Airspace Architecture Study, managed by the Infrastructure Manager, ensuring resilience of the system.*

The ETF fully agrees with the need for a standardised digital European infrastructure with interoperability of systems. We believe that this lack of standardisation is one of the main causal factors of the fragmentation of the ATM industry in Europe.

In this recommendation, the WPG is also stating that FABs should no longer be mandatory, which is something ETF agrees with. On the other hand, in some areas we also acknowledge that FABs create a working and cooperative spirit that brings a lot of improvements in the SES. The concept of capacity-on-demand is one of the oldest dreams of the SES and given the current R&D progress, it will remain a dream for still many years.



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*Recommendation 4: Create a new market for ATM data service providers as recommended by the Airspace Architecture Study.*

For many years, the mantra of the SES was ‘defragmentation’, but now, without any operational benefit, we see a new concept emerging that will bring a lot more fragmentation to the industry. The lack of standards that brings interoperability issues is the excuse put forward to justify this concept of an ATM Data Service Provider (ADSP). The consolidation of data providers, in to a commercial market, and undoubtedly for-profit service, will introduce inherent risks, and also the ultimate creation of a monopoly, or at best a duopoly.

This will in turn need economically regulating in due course. Thus, the circle completes itself. Whilst on the journey to this utopia of an ATM data market, without appropriate standards and commonality there is a significant risk that each industry player will come with its own ATM data format. We have several examples (Datalink, CFSP....) that show us the path we should avoid.

The lack of control by the ANSPs over the data, its security, integrity and accuracy, having had to ‘buy’ it from a 3<sup>rd</sup> party could also introduce unnecessary compliance and assurance costs that the ANSPs will have to bear.

*Recommendation 5: Use the performance and charging scheme to support the digitalisation of air traffic services, and public funding to support deployment only where necessary from a network perspective.*

The concept is certainly interesting. ATM systems are more and more complex, and we have recent examples of updates or implementation of new technologies that have gone very wrong in the last months (DFS example of update of stripless system, several problems in DSNA etc.). Using robust and competent processes in change management will help the introduction of new technologies and aid in avoiding social and technical issues. Focusing capital expenditure purely in to the performance and charging scheme could allow the wrong choices to be made on investment, based on lobbying and self-centred, short term interests from the airspace user community.

This is not a complementary approach to the mantra to simplify the performance scheme. The performance scheme is open to far too much influence on general price, which will inevitably put at risk the funding for digitalisation improvements. It will get lost in the overall cost base and will be first thing to be sacrificed when the inevitable further calls for cost reductions occur.

*Recommendation 6: Facilitate the transition towards the Digital European Sky by reviewing current licensing and training requirements for ATCOs, with full involvement of staff representatives.*

It is not the ATCO licence (and regulation) that makes ATCO training very long today. It’s the fact that our work is closely linked with the operational environment. Comparison with pilot training is nonsense. The ‘fashion’ for competency-based training (in fact that is what ATCO training largely already is) may work for new pilot first officers, who have an experienced captain working with them, but an ATCO is often the sole individual in the particular operational



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position and is directly responsible for the safe operation of their area of responsibility. They need to be equipped with the skills and experience to handle air traffic competently without the support of a more experienced colleague.

There is actually nothing wrong with the current ATCO regulation, which facilitates freedom of movement (the real issue here). The main constraint is actually the working environment (detailed airspace knowledge, local languages, ANSP hiring practices etc) and this environment does not lend itself to wholesale frequent movement of ATCOs between providers. Policy makers rapidly need to understand that there are deep and significant differences in the roles of pilots and ATCOs (as well as other ATM workers) and that blindly following a principle of 'let's just do what the pilots do' is doomed to failure.

There are undoubtedly areas of training that could be improved, with common technology, and interoperable systems with standardised HMIs.

The ETF would like to have more details about the link that is made between the military ATCOs and contingency procedures. Civil and military ATCOs are usually performing different jobs and we don't foresee that military ATCOs could be broadly used for contingency procedures with the same level of safety as in normal situation. Some countries tried it and the outcome was at the minimum questionable or even dramatic in some cases. Therefore the ETF would like to understand the idea behind having this paragraph in the WPG report.

*Recommendation 7: Simplify and strengthen economic regulation, while relying on a market-driven approach wherever possible.*

We fully support that the WPG is pushing to have greater account of interdependencies between targets. The market driven approach is a political view that has still not proven to be more efficient in the ATM industry. How successful has it been so far? The EU often uses the FAA approach as a comparator to highlight the inefficiencies of the European system. However, there is no market driven in the USA. In Europe, the market driven approach desired by the Commission leads to greater fragmentation not less. So, what does the EU want? A fragmented and race to the bottom market, or a network centric, cohesive, interoperable system that balances capacity across Europe?

*Recommendation 8 Establish a strong, independent and technically competent economic regulator at European level.*

The recent RP3 proposals have shown the difficulty to have an independent and technically competent body for such issues, resulting in unrealistic proposals. We don't see concrete proposals on how to improve the situation.

The ETF is strongly opposed to this economic regulator because it will only deal with economic issues without integrating the social and environmental dimensions in an equal footing.

*Recommendation 9: Establish a Seamless European (Upper) Airspace System including a common route charge*



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We support this idea as it could lead to more predictability and avoid wrong behaviours of some airspace users flying longer routes to fly through zones with a lower unit rate. It would lead to better balancing of capacity, with both ANSPs and airspace users not having to compete as much for revenue, and 'gaming' the system. It would allow the Network Manager to properly take a strategic view and implement measures that would result in less local resistance.

*Recommendation 10: Encourage airports to procure tower services through competitive tender or contract, where operationally feasible and positively impacting users.*

Once again, there is nothing new; it's purely a political unilateral oriented-statement. In the few States that have implemented a market driven approach, this has led mainly to a fragmented lower airspace, with competing ANSPs reluctant to train new ATCOs (resulting in a supply shortage) and the increase of direct employment costs.

This is a false economy. Training and recruitment become fragmented, actually driving up cost. Due to the problems surrounding recruitment and retention that this approach creates (although for workers it can be beneficial – with instances of significant improvements to terms and conditions) service delivery suffers due to a lack of available staff to open the required positions.



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