



EUROPEAN  
TRANSPORT  
WORKERS'  
FEDERATION

# **For a safe, sustainable, affordable and performant European sky**

ETF position for the preparation of the Reference Period 5 (RP5)  
of the Single European Sky Performance Scheme

June 2025





## Introduction

The European Transport Workers' Federation (ETF) acknowledges the necessity of assessing the performance of air navigation service providers, since they operate in natural local monopoly. Notwithstanding, ETF also recognises that it is the ultimate responsibility of states to have control over their airspace for sovereignty reasons, and that states must be able to have the final say about air navigation and ensure their commitment to the Chicago Convention.

The Single European Sky (SES) Performance Scheme is the central European instrument to assess the air traffic management (ATM) performance of national providers. It establishes targets and monitoring indicators in four Key Performance Areas (KPA): Safety, Environment, Capacity and Cost Efficiency. The scheme's assessment timespan is five years long and the fourth review cycle, Reference Period 4 (RP4), has started in 2025.

Despite consistent warnings, the European Commission continues to pursue a model that prioritises cost efficiency over other KPAs. The difficult adoption of SES 2+ has prevented the necessary changes of the air navigation performance regulation from being implemented.

Challenging capacity targets have once again been set, while Air Navigation Service Providers (ANSPs) are urged to cut costs. This imbalance undermines the stability of the system and has directly contributed to the ongoing staffing crisis across ATM roles. In addition, increasing geopolitical tensions lead to more use of airspace by military forces in the European Union, unfairly affecting the assessment of ATM performance.

As flight numbers surge, the system designed to keep European skies safe is under growing strain. EU policies continue to demand more with less — putting safety, sustainability, and workers' well-being in jeopardy. The current regulatory framework is the primary cause of the lack of ATM capacity we currently experience.

**In 2030, Reference Period 5 (RP5) will start, implementing a Performance Scheme that will soon be drafted by the European Commission. Political actors must be aware of this process and contribute with the needed priorities and ideas for a safe, sustainable, affordable and performant European sky.**

**Europe needs a fit-for-purpose regulation that values workers, protects passengers, and puts safety first. We need performance plans enabling safety to remain the prime objective, with appropriate recruitment levels and retention of staff in all ATM professions, a controlled shift to new technologies and addressing climate change with the best ATM contribution.**

**We must not miss the opportunity to build a fit-for-purpose framework for RP5.**



## General considerations

ETF has long been exposing the existing flaws in the SES performance setup. Since the creation of the performance regulation, there has been a **disproportionate focus on cost efficiency**, to the detriment of the other KPAs. The proposed plans are first and foremost assessed for their cost efficiency above any other concern. This creates a permanent pressure for cost-cutting, as cost efficiency aims will be effectively impossible to achieve.

In addition, **capacity** is still unfortunately mainly measured by its failure to deliver – namely through delays – rather than by the actual level of capacity that is available. The flight planning of airspace users, often inefficient, is effectively defining the ANSPs' **environmental** performance, which means that any environmental considerations of the ATM performance regulation are simply greenwashing. **Safety** is taken for granted and its measurement is an extremely difficult issue which should not make it any less than the prime objective.

The baseline that originally defined the objectives to be pursued through the SES Performance Scheme, i.e. the SES High Level Goals, has been unrealistic from the very beginning. The reference periods of 5 years are the result of an imperfect compromise. The quality of the traffic forecast is essential to make any performance plan fit-for-purpose. This element is even more challenged by the evolving geopolitical situation. It is critical to research ways to enhance the accuracy of the forecast. It is equally critical to acknowledge that a stable income level is secured in a time-horizon compatible with the need to invest in training new staff whilst keeping the existing one.

**ETF reiterates that staff costs cannot be a bargaining chip in regulators' minds**, be it the European Commission or Member State regulators.

**With this position paper, ETF intends to propose changes to the current regulatory framework, including new ideas** such as the introduction of 'Change Management' as an indicator, the shift in paradigm from 'Cost Efficiency' to 'ATM funding', and effective tools to make ATM an effective contributor to a greener aviation sector.



## ETF integrated vision for RP5

Realistic Key Performance Indicators (KPI) need to be developed, not only representing short term needs of airspace users but also building a healthy foundation for the future of the Single European Sky Network, achieving punctuality, sustainability and flexibility at reasonable cost. Interdependencies must come into greater focus and be addressed throughout the process.

### 1) CHANGE MANAGEMENT as a new indicator

Change management and human factors are a key element of the ATM system in Europe. This has been recognised in SES by the need for the so-called “5th pillar” on the human dimension. Some EU countries, like Hungary, are already using change management, within the current system, to show air traffic management performance. ETF’s approach is slightly different:

**ETF advocates for the introduction of a Change Management indicator to track and monitor the change process through RP5.**

Within the performance scheme, many different factors and stressors will inevitably result in ‘change’. This can be due to the performance improvements envisaged by the set targets or by SES initiatives driven from SESAR, PCP or EASA. ATM will face large challenges in the introduction of these changes, particularly around new technology and automation tools. In addition, significant sums of money are being invested in European ATM, particularly through the SESAR program.

To realise the full benefit of any technology introduced and the social impact it may have, a fit-for-purpose and well-managed process will be required. Change management must be considered and measured within the performance scheme so that implementation is appropriate.

The introduction of a change management indicator in the SES performance and charging scheme would allow **the progress, buy-in from staff and delivery to be properly tracked**. This would also enable the adoption of intermediate measures to mitigate possible risks and facilitate/speed up the process of change.

It has been proven that the **success of a technological change is highly dependent on the staff's commitment to it.**<sup>1</sup> A change management indicator would shed more light on the people required to deliver the intended performance.

**Such a KPI could be introduced as an additional indicator of Safety.** Using existing methodology, change management can be adequately measured. Similarly to the assessment of Effectiveness of Safety Management, a questionnaire could be distributed to States for compulsory completion.

The indicator should involve stakeholders and the Performance Review Body. It should be proportionate and not unnecessarily burdensome.

Areas that could be tracked and measured include:

- The target of change - *What are we trying to achieve?*;
- Impact assessment of the proposed change on the working methods and relationships;
- Level of staff involvement and evidence of consultation and agreement, as well as assessment of the buy-in process;
- Existence and effectiveness of an arbitration system if agreements cannot be reached;
- Availability of appropriate human and financial resources;
- Provision of proper information and training;
- Monitoring impact of change against other KPAs of the performance scheme;
- Assessment of the methodology used, including a system for dispute resolution.

Within each national performance plan, a requirement could be placed to define and then track ANSPs' change programmes against set criteria (e.g. those listed above). This could then be reported on and measured at an EU level, giving an overview of the effectiveness of change and the status of implementation of initiatives.

**Change Management as an indicator could also be used within the Capacity KPA,** which would incentivise ANSPs to provide additional capacity where needed. It would complement the focus needed on delivered capacity, rather than on the consequences of the lack thereof.

The benefits of a well-run change management system (much like a good safety system) are all too invisible; when done poorly, significant effects are noticeable. **It would be in every stakeholder's interest to include this indicator in the performance scheme for RP5.**

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<sup>1</sup> <https://www.prosci.com/blog/metrics-for-measuring-change-management>



## 2) SAFETY

### 2.1) The need for legally binding safety targets

Safety must remain the cornerstone of the Single European Sky. As the European Commission signals its intent to stop defining binding safety targets under RP5, ETF raises strong concerns.

In an evolving aviation landscape marked by rising traffic volumes, increased automation, cyber threats and complex operational dynamics, the absence of mandatory safety benchmarks constitutes a major regulatory gap.

**ETF firmly opposes the deregulation of safety objectives and asserts that safety, by its very nature, requires consistent, enforceable oversight.** It cannot be left to voluntary compliance or loosely defined indicators. This would create dangerous discrepancies across Member States and ANSPs, ultimately undermining the uniformity and integrity of the European ATM safety framework.

### 2.2) A shift towards positive safety metrics

The current safety measurement framework relies heavily on counting incidents and near-misses. ETF advocates for a more comprehensive approach, integrating positive performance metrics, such as:

- Number of flights completed without safety incidents;
- Level and continuity of operational staff training;
- Maturity and effectiveness of Safety Management Systems (SMS);
- Indicators of internal safety culture.

Such metrics can support a **proactive, systemic safety culture, rather than a reactive, incident-driven model.**



### 2.3) Addressing fragmentation in the safety chain

ETF is increasingly concerned about the fragmentation of safety responsibility due to functional separation, outsourcing and digitalisation.

When elements of the ATM chain fall outside the direct control of national ANSPs or become dependent on external providers, the coherence of safety oversight suffers.

A renewed regulatory approach is required to **ensure that the entity accountable for safety has actual authority over all contributing components.**

### 2.4) ETF key demands for Safety

RP5 will coincide with a decade of transformation in air traffic management. Technological innovation, increased capacity demand and decarbonisation efforts will reshape operations. In this context, safety must not be diluted.

**ETF urges the European Commission and Member States to reject the deregulation of safety targets and guarantee strong oversight, monitoring, and staff involvement mechanisms.** Mandatory safety goals must be enshrined in EU legislation. Only through legally enforceable commitments can Europe ensure a safe, resilient and future-ready ATM system.

With this in mind, ETF's key demands for RP5 regarding Safety are:

1. **Legally Binding Safety Targets:** RP5 must include clear and enforceable safety performance objectives set at the European level, with legal backing and oversight mechanisms to ensure compliance.
2. **Mandatory Safety KPIs in National Performance Plans:** every Member State must incorporate standardised, measurable safety KPIs into their performance plans. These should reflect both reactive and proactive safety dimensions.
3. **Annual ATM Safety Report:** ETF proposes the publication of an annual ATM Safety Report prepared by EASA's Collaborative Analysis Group, under the authority of the Performance Review Body (PRB). This report must be based on stakeholder consultations, including operational staff representatives.
4. **Change Management as a Safety Tool:** ETF reiterates the importance of a dedicated Change Management Indicator. This tool must monitor and guide the implementation of operational and technological changes that can impact safety, with specific emphasis on staff involvement, training and social dialogue.





### 3) ENVIRONMENT

Earth's climate system is changing rapidly, and to some extent irreversibly, due to human activity. The United Nations already calls this crisis a 'code red' situation and they are right to do so. Urgent action is necessary in all sectors of the economy to try to mitigate the effects of climate change, with substantial **efforts needed in decarbonisation, particularly in the aviation industry.**

At COP26 in November 2021, 197 governments reaffirmed the target set out in the Paris Agreement in 2015 for countries to restrict global temperature increase to 1.5 degrees, which will require emissions cuts of 45% by 2030 (relative to 2010 levels), and net-zero by 2050.

Although the agreement does not foresee emission reporting of the aviation sector (understood to be between 2.5% and 5% depending on the source and width of the scope) out of the total global CO2 emissions, we are clearly lagging behind this schedule, considering that only 11% of the Earth's population flew each year before the pandemic.

Whilst there are growing evidence that the world is going off track regarding the agreement, **Europe must take the lead and stop greenwashing its policies.** Either environmental contributions of EU policies are concrete and measurable – or they do not contribute at all to this effort.

Air traffic management is a service delivered to airspace users and the overflowed population. Its possible contribution to climate goals is in the routes it allows aircraft to fly.

Unsurprisingly, **the most environmentally friendly route for an aircraft is the shortest one.** The shortest, most efficient route allows, to a certain extent, to minimise the use of fuel the amount of CO2 released to the atmosphere.

However, route-efficiency (or shortness) is not the first criterion of airspace users when choosing their routes. **Their priority is to fly cheap.** As a study commissioned by FAB CE showed, most of the time airlines fail to even select the best available route under their own criteria.

Furthermore, the military use of airspace is deteriorating the measurement of the environmental performance of ATM, as the avoidance of reserved pieces of airspace for military aircraft is one of the fundamental reasons for deviation from the shortest route.





In the end, the evaluation of the ANSP's environmental performance is impacted by the inefficiency of the actually flown routes, disregarding that the whole network capacity relies on external flight plans and their published times. Even with optimal trajectory planning, it is possible that direct routings can be even counterproductive or not possible due to other reasons such as adverse weather situations or active military areas which must be circumnavigated.

The environmental measurement of ANSPs' performance disregards the importance of airlines' own flight plans and whether the most direct possible routing given by one single ANSP for a given flight increases or decreases the total length of the flight.

This means that **the current system measuring the environmental impact of ATM is, ultimately, nothing but greenwashing. It pretends to address environmental concerns, but it is not effectively measuring the action or inaction of ANSPs in this matter.**

Whenever capacity shortages occur, the environment seems to be the last concern of airspace users. Detours are taken gladly to avoid delays. Some level of detour is obviously required to organise air traffic in the sky. Complete free route is not yet a reality and it is unsure whether the technology will ever be able to support it sufficiently to provide the capacity.

To make the environmental concerns really a factor, **the role of a centralised entity managing the ATM network is crucial.**

- ETF is therefore proposing to **establish a mandatory route selecting service by a centralised entity**, which would not only assign the most sustainable route (considering weather, restricted airspace, forecasted winds and restrictions decided by airspace users), but also work in close cooperation with flow management to avoid capacity shortages and over deliveries.

Such a service can also be the missing element to **begin tackling the issue of vertical efficiency** and would naturally find its limits with the captain's discretion principle should the route assigned be found irrelevant by the crew.

- **A new KPI shall measure the efficiency of the ANSPs' route system** in providing the shortest and therefore most sustainable routes. A change management indicator should ensure the involvement of staff representatives as previously mentioned.
- Lastly, the way in which the ATM funding is currently calculated is not helping the environment, and we believe that there are better ways to make progress and **incentivise greener aviation through the ATM charging scheme**. We will come back to that in the 'ATM funding' section.



#### 4) CAPACITY

One of the main goals of SES is to increase capacity of ATM system throughput in a safe, environmentally friendly and cost-efficient manner.

So far, the European approach has not delivered the necessary capacity gains because of a disproportionate focus on cost efficiency.

**We propose to shift this hierarchy of goals. We propose to focus on increasing throughput, and doing so in a safe and environmentally friendly manner.** Once a plan is established along these principles, then it should be executed in the most cost-efficient way.

The current capacity indicators on which targets are set do not actually measure capacity – they measure the lack of capacity based on induced delay. However, capacity is not constant, whether as a metric for the entire airspace controlled by an ANSP or as a number describing a piece of airspace (sector). On the other hand, delays are a symptom of safety delivery: a way to avoid the ATM system from overflowing.

The definition of capacity is not as straightforward as it might seem. At first glance one might say that it should be expressed as the number of aircraft that can be serviced in a defined time interval (e.g. 100 flights per hour). If we would put more aircraft into such a system (e.g. 200), delays would appear as a symptom. In this vein, one would think that delays are therefore a good indicator of capacity because if they do not exist, then capacity is sufficient.

Furthermore, it is thought that the increase in delays is directly proportional to the lack of capacity and vice-versa. Based on this assumption, one would conclude that this is a good indicator to measure the capacity performance of an individual ANSP. The reality, unfortunately, does not support this reasoning.

**If we go deeper, we can see that capacity value cannot be defined as a constant, because several factors influence the real time management of traffic flow.**

To explain this, we would like to show the most influential factors:



## Factor 1: Complexity

This is one of the least publicly recognised factors but the one that has the most influence on the number of aircraft that can be serviced in each piece of airspace (sector) at a given time. In general, when complexity increases, the capacity decreases. Complexity has two elements: planned and unplanned complexity.

### ***Planned complexity***

A sector can handle fewer aircraft if the flow of traffic includes lots of vertical movements, services lots of crossing routes and the traffic consists of a high number of aircraft with different performance (speed, climb performance, cruising altitude, etc. – commonly known as traffic mix), as opposed to the same sector with a traffic flow of similar aircraft flying to the same geographical direction with few level changes and minor speed differences. It can be concluded that **the characteristics of the traffic flow itself define the capacity**. The numbers that are assigned to a certain sector as capacities are empirical numbers based on the usual traffic flow in that sector and ultimately reflecting the maximum safe workload of the controllers working there.

### ***Unplanned complexity***

Another factor that can significantly and – perhaps more critically – unpredictably increase complexity is weather (thunderstorms, turbulence, etc.).

By reducing the planned complexity of the airspace structure and/or complexity of traffic flow, capacity is expected to increase. The number of aircraft in a certain sector can then grow. To handle unplanned complexity increase, the remedy is to have enough reserves in terms of staff to ‘slice’ the sectors into smaller pieces when necessary and possible.

## Factor 2: Staffing

Staffing issues are underrated in the current monitoring by the network. As simple as it may sound, **the most effective method to increase capacity is still the provision and training of staff that enables the necessary number of sectors to be opened** when traffic demand (or unplanned complexity increase) requires it.

Pressure to reduce costs and recent crises leading to revenue shortages have incentivised several ANSPs to cut staffing and/or to defer training of new recruits. Such a phenomenon is not compatible with reaching a sufficient level of trained staff to provide air navigation services.

Unfortunately, contrary to the common belief, **doubling the number of controllers does not mean doubling the capacity – it means less than doubling**. As the airspace saturates, opening new sectors (i.e. slicing the airspace into smaller pieces) increases complexity and gains in throughput decrease with the number of sectors.

It should also be noted that, as it is a demanding career, the willingness of young people joining the sector and the desire for existing staff to remain in employment in the sector are highly influenced by the prospective stability and enhancement of social conditions.

To foster such an environment, **ANSPs must not be forced by any means to degrade working conditions or social benefits**. It is obvious that failing to keep staff in times of downfall results in

lack of capacity, as can be seen in the current capacity constraints in the aviation system at airports and many ANSPs.

**Good working conditions and benefits are essential to maintain an efficient aviation ecosystem**, including in the provision of air navigation services.

### **Factor 3: Technology**

Technology could be a true enabler in increasing capacity. Unfortunately, the financial resources spent on **development and introduction of new technology have not delivered as promised**.

Even the potential of existing system capabilities cannot be fully exploited because of interoperability issues and the lack of enough EU-wide requirements in this respect. As the Commission is pushing for market principles in ATM system provision – which, in our view, is counterproductive to interoperability in its current form –, it fails to reflect market realities of ATM system providers.

Meanwhile a thorough assessment of investments in this area is not conducted while these costs represent a significant amount in the performance plans of states. In our view, it is in the interest of the citizens of the EU that these investments in technology are not spent in vain.

### **Factor 4: Airspace design changes**

We also acknowledge that the way in which the airspace structure is built affects capacity. When traffic patterns vary, it may be beneficial to change the design of the airspace to increase capacity.

**This can be measured by a change management indicator** as previously mentioned, comparing the previous situation with the expected one, and making sure that the transition is appropriately managed.

### **Conclusion: How should we measure capacity?**

From the above, it is clear that delay measurement is not a fit-for-purpose tool to effectively enhance capacity. The allocation of delays to single ANSPs and with a single cause of regulation lacks the necessary system-wide view that is the Single European Sky perspective and does not incentivise improvement. **The targets are unrealistic and just make ANSPs treat it as another cost element.**

We suggest that to realise the goal of creating a European ATM system with higher capacity, we should set targets that are fair to expect from ANSPs, rather than setting targets on which they have only limited influence (e.g. traffic mix, weather, neighbouring ANSPs' capacity, technological tools available).

That would mean **putting the focus on actually existing capacity or throughput** – which, unfortunately, is currently only an indicator for monitoring (EU IR 2024/3128) – and using delays only to identify areas where throughput capabilities are to be improved without any targets set.



The **introduction of a centralised entity in charge of assigning routes** to aircraft at the flight planning stage is also an enabler of better use of the available capacity.

**In conclusion, ETF recommends that the measurement of capacity is done along the following principles:**

- Change management;
- Training and staff (level of staff and training continuity);
- Technology (change management including proof of capacity gains);
- Complexity analyses – trade-off;
- Airspace changes;
- Better use of available capacity (a centralised entity in charge of assigning routes to aircraft at flight planning stage);
- Use of delays only as capacity shortage indicator, not as a goal;
- Set targets on throughput, as that is the ultimate goal and the one ANSPs have the most influence on.





## 5) ATM FUNDING (instead of Cost Efficiency)

ETF suggests renaming the KPA 'Cost efficiency' to 'ATM Funding'.

'Cost efficiency' is, by definition, the act of saving money by changing a product or process to work in a better way. It is measured in businesses by monitoring the ratio of the output produced to the costs incurred. The critical question we have to ask is: **what is the product of an ANSP?**

ETF reminds all stakeholders that the commitment of States, undertaken by the signing of the Chicago Convention, is to ensure air traffic management regardless of the existence of air traffic. We believe that the ANSPs' product is **a safe, orderly and expeditious flow of air traffic at any given time**, not simply the number of flights conducted within the area of responsibility.

As operators tend to fulfil the requirements assigned by the European Commission but cannot increase resources (since traffic is not a product of the ATM industry), they always make decisions on what they can change: cost. Unfortunately, most expenses are related to having staff to provide the service.

**A KPA of ATM funding should be shock resilient, reflecting the responsibility of States on the continuous existence of an adequate ATM infrastructure.** How to tackle this KPA should be left for definition and approval at national level, as local/national circumstances are of the essence of what affects cost of service provision.

**Staff availability and competence are an essential element of ATM safety delivery.** Discontinued employment is difficult to reconcile with safe service delivery.

Considering the length of training of most safety related personnel, **training new staff should be eligible to be counted as an investment that depreciates** over the expected retention period of this staff member. Measures to ensure retention of staff could follow the same logic.

Furthermore, regarding ATM funding, we believe it is important that **ANSPs' uncontrollable costs** – most of which are outside the scope of the regulatory powers of the EU and were existing well before the creation of the performance scheme – **remain untouched** as in previous reference periods. Some of these costs cannot be adequately absorbed directly by ANSPs unless some form of other allowance is made for their recovery. Financial sustainability is key to ensuring uninterrupted



air navigation service provision, and it would be unrealistic to suddenly force an ANSP to bear these costs in the form of a simple price cap.

Capital expenditure (CAPEX) does need to be examined. Whether or not it forms part of the performance scheme itself, transparent and accurate analysis of investments should be completed and complemented with a list of actions submitted to the change management indicator. However, it is not appropriate for airspace users to have control or 'final sign-off' of investment plans.

**ETF strongly advocates to keep the regulation for ANSPs to adjust their determined cost for inflation, eligible costs and recovery of unforeseen costs.**

ETF is cautiously in favour of the deployment of technological developments, **provided that they are properly funded, well-thought-through, part of an adequate change management process and appropriate and comprehensive social dialogue has taken place.** These technologies should be able to demonstrate real benefit with the supporting case of a mature cost-benefit analysis completed to demonstrate their real value. To ensure staff commitment, which is crucial for the success of a new technology, this cost-benefit analysis should be part of the change management process including social dialogue to enable inputs and comments from staff representatives.

The charging mechanism does not adequately support the Environment and Capacity KPAs as the interdependencies show: a more sustainable and/or larger capacity ATM system is often a more expensive one. Due to the nature of the charging process, cheaper routes are often flown by users which are not the most environmental, or cause the funnelling of traffic, thus increasing the pressure on capacity unnecessarily.

**The introduction of a centralised entity in charge of assigning routes to aircraft could also be an opportunity to redesign the formula to calculate en-route charges.** Instead of calculating the air traffic control charges according to the flown distance in nautical miles and maximum take-off weight, the use of an **ecological basis as a calculation** in the future is proposed. Actual load of the aircraft could be reflected in view of getting smaller aircraft to pay a potentially larger share of ATM charges, as the burden to provide ATM services to a business jet or to an A380 is similar.

Cost of cross border service provision is often a topic which is dealt with at a bilateral level – when it is at all tackled (as it is not tackled for Kosovo upper control). Principles and guidelines to **ensure appropriate resources for the country actually providing services** should be established without being mandated.

**We also propose rewarding fuel efficiency:** each manufacturer can provide an average actual consumption for its aircraft types. The aircraft type with the lowest consumption on an annual reference date (or per reference period) is to be set as the baseline in Europe. Deviating from this, there would be an incentivising system based on route charges variation for those types that consume more fuel. This incentivising scheme should remain neutral over time for ANSPs.



## Conclusion

ETF believes in the added value of ATM performance monitoring. However, since the creation of the performance regulation, there has been a disproportionate focus on cost efficiency to the detriment of the other Key Performance Areas.

This leads to a continuous pressure on service providers to cut costs, which then creates structural imbalances that undermine the stability of the system and contribute directly to the ongoing staffing crisis across ATM roles.

The performance setup is structurally unfit, with capacity, environment and safety not being assessed in a realistic, fair way. Furthermore, in a sector receiving so much public funding, investment oversight is faulty.

**We believe that an inclusive approach rewarding positive change should be established. This could be achieved by:**

- introducing change management indicators;
- acknowledging the interdependencies between the KPAs;
- measuring safety for what it should be;
- avoiding greenwashing and using ATM charges instead of actually making flying a greener activity;
- looking at capacity, not at the imbalance between available capacity and actual demand;
- measuring cost efficiency in a manner which continuously allows the ATM industry to be adequately funded.

**In 2030, Reference Period 5 (RP5) will start, following a legislative process where different EU institutions will have a say about the performance scheme we want for Europe.**

**We must not miss the opportunity to build a fit-for-purpose framework for RP5.**

Please do not hesitate to get in touch with ETF to further discuss these proposals for the better of aviation.

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