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British Airways response
Revised Irish Performance Plan for Reference Period 3 (RP3)

Thank you for the opportunity to respond to your latest consultation on the revision of the Irish Performance Plan for Air Navigation Services; we set out below our views on Ireland's revised Reference Period 3 (RP3) Performance Plan proposals and implications for the wider policy environment

- 1.1. **We support the revision of the submitted plan following the publication in October of the updated STATFOR traffic forecast** which significantly increased the rate of traffic recovery in 2022 and 2023, particularly in regard to Scenario 1 and 2 ("High" and "Base" respectively), with a notable increase to En Route Service Units (SUs) compared to the May 2021 STATFOR forecast
- 1.2. **Limiting the consultation to areas of material change resulting from the updated traffic forecasts is a practical approach** given the proximity to the submission of the Revised Draft Performance Plan in September 2021 and the differing levels of sensitivity of each price control building block to traffic variations
- 1.3. The increase in costs, to support the expedited ATCO requirement for 2022 and 2023, will **not excessively raise the overall Determined Cost ("DC") where reasonable adjustments are made** to operational expenditure building blocks across the 2022 to 2024 period
- 1.4. Given the requirement for ATCOs earlier than previously forecast in order to meet demand, and current status of the ATCO training program, it is **not clear how this training can be delivered, considering the typical extended lead times associated with ATCO training and validation**, particularly to meet airline demand in 2022
- 1.5. Ultimately, **balanced and achievable adjustments to staffing profiles should be adopted in order for the economic incentives to be effective**



- 1.6. Safety continues to be our overriding priority and **we support the maintenance of the existing safety targets**
- 1.7. Given the proposed increase in operating costs as a result of the new traffic forecasts, which fairly compensate for increased capacity requirements, **the targets must be maintained in present form to promote effective incentives and efficient outcomes to existing standards**
- 1.8. It is important that effective incentives are incorporated into the Performance Plan and that they are balance being both stretching and achievable; we believe this **balance has not be optimally struck in the Environment KPA's and should be reassessed**
- 1.9. The **revised Environmental targets reflect a minimal improvement on 2019 levels** and represent a considerable decrease in standards compared to the October 1st Revised Performance Plan; whilst forecast traffic levels have increased significantly in 2022 from previous forecast, the adjustments to targets in 2023 and especially 2024 are unnecessary, when newer traffic forecasts show minimal variation from the previous iteration, and severely weaken the ambition previously demonstrated to improve environmental performance

Yours sincerely,



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