

IRISH AVIATION AUTHORITY STAFF PANEL UNIONS



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Response to supplementary consultation on RP3 Performance Plan

The Staff Panel welcomes the opportunity to respond in this supplementary consultation. We note the following:

- We welcome the revised forecast and note that it corresponds to our earlier assertions that “Scenario 1” should have been the basis for the initial decision.
- Once again, a lack of consideration to the interdependencies of Safety, Cost Efficiency, Capacity and Environment is evident and concerning. As safety should be always the primary consideration in the provision of ATM the Panel is concerned that a return to 2019 levels of traffic before enough staff are trained to meet demand will influence safety yet the CAR seems unwilling to examine this.
- We are disappointed to see that the CAR intends to continue using its “building blocks approach” which we believe contravenes the spirit, if not the letter, of EU 317/2019. The assumptions used to arrive at its decision are flawed. This will lead to an ATM system that will not be adequately resourced to deliver required capacity when aviation recovers.
- The model, again, fails to address the fundamental fact that the ATCO staffing levels in 2019 were not sufficient to meet the traffic in that year. A return to 2019 staffing levels in 2023 will not deliver the capacity required. More ATCOs will be needed and should be allowed for in the model.
- CAR has already acknowledged that extra ATCOs relative to 2019 levels are required to deliver a terminal service for the new runway in Dublin. However, the proposed ATCO count does not reflect this reality.
- To assume overtime can cover capacity shortfalls is unrealistic. Limitations on hours an ATCO can work, due to EU 373/2017 mean the levels of overtime delivered during RP2 are no longer available.

In summary the proposed model changes will fall short of the resources the ANSP will actually require to deliver a safe service in compliance with the capacity, environment and cost efficiency KPIs.

Aviation has always, without fail, recovered more quickly and more robustly from systemic shocks than predicted. This time will be no different. It is critical, therefore, that the CAR provides the ANSP with an adequate funding model to allow it to deliver the service its customers will soon require.

We call upon the CAR to take the opportunity to build the model using realistic staffing counts, actual verified data and eligible costs, as regulation EU 317/2019 states and intends. We call on the CAR to abandon the “building blocks” model they have created which uses unrealistic assumptions that will leave the Irish ATM system critically under-resourced when aviation recovers.