



Date 10/11/21

**Mr. Luke Manning,
Senior Economist,
Commission for Aviation Regulation,
Dublin 2**

By e-mail to: info@aviationreg.ie

Ref; Response to supplementary consultation on RP3 Performance Plan

Dear Mr. Manning

Thank you for opportunity to comment on your updated draft Performance plan for Ireland for Reference Period 3 (RP3).

As discussed on 31 August, our members requirement is for all states to comply with and preferably better the minimum EU-wide performance targets in the key areas of Cost Efficiency, Environment, Capacity and Safety, while applying the STATFOR Base case as required by regulatory framework.

We note and support the intention of the CAR/IAA to update the already submitted plan to include the positive effects of the updated October STATFOR BASE Forecast. While we note that the additional traffic will assist in the IAA achieving the cost efficiency targets, it is based on the volume and cumulative effect over the period in both enroute and terminal. A focus must remain of cost-effective service delivery, with capacity scaled to demand. IATA are somewhat concerned that the additional costs proposed are not representative of the numbers required for the recruitment and training of some 29 additional ATCO`s between 2022/23. We do not see how, if training only recommenced in 2021, that 18 ATCO`s would be fully trained and available for enroute operations by 2022. Also, the requirements for On the Job (OTJ) training could have a material impact on the level of resources deployed to manage the operation and implement the ambitious capital programme. We believe that the majority of the additional cost proposed would be used to facilitate overtime to deliver the required capacity, at a significantly higher cost. It must also be pointed out that by 2023 the cost proposed are still above the levels of 2019, while traffic (IFR and SU) will still be below the 2019 levels.

To assist in our understanding can the CAR/IAA supply more up to date information about

1. The training and recruitment of ATCO`s post the August consultation?
2. How many trainees are expected to be operational by Summer 2022, considering the cancellation of training courses in 2020?
3. How many direct entry ATCO`s have been hired ? Are they on contract or permanent staff?
4. How many sectors are required to handle the uptake in traffic? When will these be available ?

On Capacity IATA fully supports the targets set in the performance plan and the intention to retain the penalty only incentive scheme for enroute and terminal capacity. IATA support the intention to meet the National targets as developed by the Network manager, which we believe are still appropriate given the historic performance over RP2 when the IAA successfully managed additional traffic (avg +8%) with zero CRSTMP delay. IATA understands that in the terminal area, arrival delay is consistently below the EU Average. Within the terminal area the historical delay performance is such that it represents close to zero.

On Environmental performance, IATA believe that the revision of targets should be reconsidered. As indicated in August, the IAA have consistently achieved their KEA and KEP Targets, throughout RP2, when facing a traffic scenario which averaged 8% above forecast. While we understand the rationale of having stretching but achievable targets, we believe the +6.8 % for 2022 followed by a further +8% increase as proposed from 2023 as too great a change. IATA is of the opinion that the 2021 level could be maintained for the period.



The development of unit rates for 2022 and beyond are a real concern for our members. We note that the Irish state has proposed to develop a recovery strategy for aviation. To that end IATA once again ask that that the Irish state gives some consideration to funding the revenue gap from 2023, that was driven by the States decision to insist on multiple lockdowns and bans on non-essential travel. Airlines should not be held wholly responsible for funding the revenue gap of the IAA due to these measures. As an island nation, which is dependent on-air connectivity for not only tourism, but wider economic recovery, the Irish government should consider invoking EU2019/317 Article 29.6 to fund the competitive recovery of Irish aviation and to ensure that the thousands of jobs and millions to the economy that it generates and supports can be safeguarded for the immediate future.

We remain available for further discussion or clarification,

Yours Sincerely,

A handwritten signature in black ink, appearing to read "R. Sergison", is written over a light blue horizontal line.

Rory Sergison,
Head , ATM Infrastructure, Europe
Safety and Flight Operations,
IATA