



AIRNAV IRELAND STAFF PANEL

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Staff Panel Submission on the revised draft RP4 Performance Plan

The Staff Panel supports the IAA proposal to apply Scenario 1.2 in the main. Recognition by the IAA that adequate staffing is crucial to deliver necessary capacity is welcome.

We believe that RP4 will present significant challenges for the European ATM system. It will be characterised by significant delays driven by staff shortfalls. A shortage of staff, coupled with ease of mobility, will create upward cost pressure on staff salaries and conditions, and ANSPs will need to be adequately resourced to meet these pressures and train new staff required to deliver capacity.

The DUC trends for RP4 proposed by the PRB do not acknowledge these pressures, and the “business-as-usual” worldview presented by the PRB will only result in larger delays, reduced system resilience and our ATM system becoming more under-resourced. This trend of cost cutting and deteriorating performance has been in train now for a number of years. Each year that passes without a meaningful acknowledgement of the seriousness of the situation by the PRB and the EU Commission makes it harder to recover from.

In the absence of the PRB addressing the fundamental problems it is vital that the NSAs recognise when a crisis exists that must be addressed. That time is now.

We address the proposed additional capacity measures in turn:

Measure 1: Increase ATCO staffing levels

We do not agree with the assessment that the current high ATCO attrition rate is “business-as-usual”, as described in Annex R.

ATCO attrition up until the end of RP2 was small, and generally driven by retirements. It is now significantly larger, and is due to several factors, such as inadequate pension provision, working hours and conditions, a global shortage of ATCOs and increased ease of movement due to the common ATCO licencing system in Europe.

This is a new phenomenon and has placed AirNav in an unsustainable staffing position. The Staff Panel notes and agrees with the IATA view that addressing this is a management function. However, other than overtime costs no significant measures were implemented in RP3. Therefore there is no “baseline” data where these costs were being incurred.

Costs associated with reversing this attrition crisis should therefore be included in the scenario.

We believe that this measure will require careful implementation and believe that it should be applied in the same way as unspent CAPEX is returned to the Airspace Users , i.e. at the end of the RP+2. This is so the organisation is not penalised during the reference period for a target that it might miss one year but ultimately achieve by the end of RP4.

We also believe that the definition of “ATCO” needs to be clearly defined by the IAA so that assessment is conducted transparently. Our view is that an “ATCO” is defined as a permanent member of AirNav staff that can provide an ATC service, i.e. has a current unit endorsement. ICAO Annex 1¹ defines a rated air traffic controller as:.

An air traffic controller holding a licence and valid ratings appropriate to the privileges to be exercised.

Temporary measures such as provisional inability should not result in an ATCO not being counted.

We would highlight that RP5 will be characterised by extremely high levels of ATCO, engineer and management retirements. We need to prepare for this by recruiting and training throughout RP4. Therefore it will simply not be possible to have “excessive” staffing levels.

Measure 2: Increase Engineer staffing levels.

The same points apply as for measure 1. The Staff Panel supports this measure.

Measure 3: Recruitment of new OMS staff

The Staff Panel supports this measure.

Measure 4: Other non staff Op-ex.

The Staff Panel supports this measure however we note that the target of 95 check outs from 123 trainees is overly ambitious. A pass rate of 70% is more realistic. For 95 check outs that would mean 135 trainees, with extra costs associated.

Measure 5: Investment in the new ATM system

The staff panel supports this measure. As stated at the stakeholder consultation this system will not deliver any capacity benefits during RP4.

Measure 6: Investement in a new contingency system

The staff panel supports this measure.

Measure 7: National RADAR upgrades.

The staff panel supports this measure.

Measure 8: Minor Capacity Projects

1 <https://www.pilot18.com/wp-content/uploads/2017/10/Pilot18.com-ICAO-Annex-1-Personnel-licensing.pdf?srsltid=AfmBOopjP9mOwjP3Nj68HheUsW9-tTHTJMyGOPRJrc-RoEecw>

The staff panel supports this measure. We also welcome the IAA position, outlined at the stakeholder consultation, that over delivery of CAPEX projects will result in extra recoverable costs on top of the draft decision.