



**Work Plan to Establish an
Irish Air Navigation Services Performance Plan
for the Fourth Reference Period 2025-2029 ('RP4')**

10 November 2023

Table of Contents

1.	About this Consultation.....	3
2.	RP4 Timeline	4

1. Background

- 1.1 The Irish Aviation Authority (IAA) is the civil aviation regulator for Ireland. Until 1 May 2023, the Commission for Aviation Regulation (CAR) was Ireland's independent economic aviation regulator. From 1 May 2023, pursuant to the Air Navigation and Transport Act 2022, CAR was dissolved and its aviation regulatory functions were transferred with the aviation regulatory functions of the IAA. Consequently, the IAA is now the single Irish NSA, with responsibility for the development and submission of a draft Air Navigation Services Performance Plan as provided for by Commission Implementing Regulation (EU) 2019/317, "the Regulation".¹
- 1.2 The current Performance Plan will expire at the end of 2024, and a new Performance Plan for Reference Period 4 (RP4) will take effect. In this document, we outline our work plan ahead of our submission to the European Commission of a revised draft performance plan for RP4, which is required by 1 October 2024.
- 1.3 We published a Draft version of this timeline on June 15th and requested that interested parties provide responses by July 14th. Submissions were received from Aer Lingus and AirNav Ireland (ANI) and we have used this feedback to decide on our final work plan.

¹ [COMMISSION IMPLEMENTING REGULATION \(EU\) 2019/ 317 - of 11 February 2019 - laying down a performance and charging scheme in the single European sky and repealing Implementing Regulations \(EU\) No 390 / 2013 and \(EU\) No 391 / 2013 \(europa.eu\)](#)

2. RP4 Timeline

- 2.1 Below we set out our final timeline for the development of the RP4 Performance Plan. The timeline was amended from the draft position following feedback from ANI. The Draft timeline was supported by Aer Lingus.
- 2.2 We note that the below is set out as a planned timeline for working purposes and to assist stakeholders in planning their engagement with the process. Should there be changes to the requirements outside of the IAA's control, or other unanticipated events or delays, it may be necessary to amend these timelines.

Publication of Issues Paper

- 2.3 In the Draft Timeline consultation, we proposed to publish an Issues Paper in December 2023. The purpose of this is to consult on the key issues for RP4, as well as the methodologies we should use for each building block, and the learnings from RP3, before developing the Performance Plan next year. Following the publication of the Issues Paper, we proposed to allow one month for responses.

Stakeholder views on the timing of the Issues Paper

- 2.4 ANI requests that the IAA have regard to the workload associated with RP4 planning, as this will be the third such occurrence since 2019. It expresses concern that the resources required to fulfil the IAAs data requests will impact on its ability to prepare a comprehensive plan.
- 2.5 ANI also notes that this is the first time such an Issues Paper is being prepared in this manner, stating that it is not prescribed in the Regulation and is not taking place anywhere else in Europe. It asks that, if it must happen, that the key results are consulted in a consolidated manner in Summer 2024 and not during the middle of the intensive planning period.

Decision on the timing of the Issues Paper

- 2.6 We confirm the planned publication of the Issues Paper in December 2023. We will likely allow six weeks for responses to this consultation, rather than one month, as the consultation period will incorporate Christmas and New Year's.

Provision of Draft and Final Business Plans from ANI and MET ASD to IAA

- 2.7 In the Draft Timeline consultation, we proposed that the Draft Business Plans from ANI and MET ASD be provided to the IAA in March 2024, and that the Final Business Plans be provided in May 2024.

Stakeholder views on the timings for the Provision of Business Plans

- 2.8 ANI states that the timelines proposed in the consultation are not sufficient for it to develop a comprehensive Business Plan in time for the stakeholder

consultation.

- 2.9 It also does not consider it feasible to deliver a draft plan in March followed by a final plan in May. It notes that in 2021, ahead of the revised RP3 Performance Plan, key assumptions were changing until October and that it would be disproportionate to insist that it produce a final plan in May as the final union wide targets for RP4 will not be available.
- 2.10 ANI acknowledges that more time in the summer for consultation would be optimal but considers that the planning process shouldn't be reduced to allow for it. It also notes that it is not aware of any other ANSP that is required to produce a final plan in May.
- 2.11 ANI believes that the requirement to have a publishable version of its plan ready in May would undermine the consultation process as it believes that the key assumptions and planning information will continue to change in June and July.
- 2.12 Based on the above, ANI requests that its final Plan is delivered in non-publishable format no earlier than mid-July.

Decision on the timings for the Provision of Business Plans

- 2.13 Having considered ANI's views, we have decided to amend the timings somewhat for receiving the Draft and Final Business Plans. We now expect to receive the Draft Business Plans in April, rather than March, and the Final Business Plans in June, rather than May. If necessary, ANI can provide a publishable version of its Final Business Plan in July, which we will publish alongside our Draft Decision.

Publication by IAA of Draft Decision on Draft RP4 Performance Plan

- 2.14 In the Draft Timeline consultation, we proposed to publish the Draft Decision on the Draft RP4 Performance Plan in June 2024, and to then provide between six weeks and two months for written responses, depending on the exact timing of the publication.

Stakeholder views on the Publication of the Draft Performance Plan

- 2.15 ANI requests that the timelines from the planning processes be kept consistent with the previous process, noting that a larger gap between the final plan and the submission to Europe (May-October, as currently proposed) will result in ANI being at a disadvantage compared to the rest of Europe as the consultation will not have adequately taken account of the latest information available.
- 2.16 ANI also states that a six-to-eight-week period to provide written responses is unnecessary as the draft plan will not be submitted to the PRB in October, but rather in November, as was the case in 2021. It therefore requests that the period for written responses be reduced to four weeks.

Decision on the Publication of the Draft Performance Plan

2.17 Having considered ANI's views, and in light of the changes we have made to the timings for the Draft and Final Business Plans, we will now publish the draft Decision on the Draft Performance Plan in July 2024. We will aim to allow for a six week consultation period to provide written responses.

Consultation Meeting on Draft Decision on Draft Performance Plan

2.18 In the Draft Timeline consultation, we proposed to hold a consultation meeting (or meetings) on the Draft Decision with stakeholders in July 2024, at least three weeks after the publication of the Draft Decision.

Stakeholder views on the Consultation Meeting on Draft Decision on Draft Performance Plan

2.19 ANI states that many jurisdictions will consult in August and September, which it would also prefer.

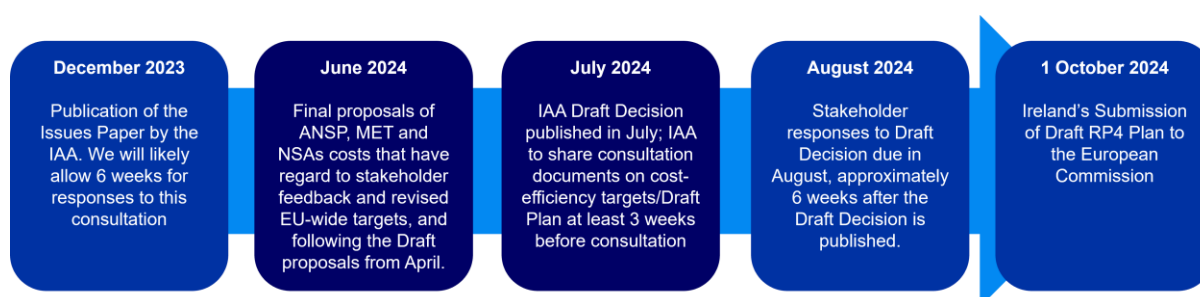
Decision on the Consultation Meeting on Draft Decision on Draft Performance Plan

2.20 We will arrange a consultation meeting (or meetings) to be held three weeks after publication of consultation material. Hence, given the change described above, this will likely be in August.

Submission of Draft RP4 Performance Plan and Publication of IAA Final Decision

2.21 We will submit the Draft RP4 Performance Plan for Ireland by 1 October 2024, as required by the Regulation. We will also publish the IAA Final Decision on the Performance Plan, which will set out how we have taken into account the stakeholder feedback received on the Draft Decision, where we have made changes, and why/why not. Chart 2.1 summarises the proposed timeline.

Chart 2.1: Proposed Timeline of Consultation on the Draft RP4 Plan



Source: IAA