



"[air navigation control, [...]] is a task involving the exercise of public authority and is not of an economic nature, since that activity constitutes a service in the public interest which is intended to protect both the users of air transport and the populations affected by aircraft flying over them".
(Extract of decision C.364/92 of the European Court of Justice).

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PRB Union-wide target ranges for RP4: ATCEUC calls for one step back, it is time for a reality check!

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"Assumptions", "experiments", "forecasts", "models with advantages and disadvantages", "statistics", "probability", "expected benefits". One thing is sure when you add uncertainties one after the other: **the end result will be completely different from reality!**

It is ATCEUC's reaction when considering PRB's **"Advice on the Union-Wide target ranges for RP4"**. ATCEUC does not discuss the PRB's probity and willingness to produce qualitative results. The PRB worked to fulfil the task: studies were made, experts gave their conclusions. Nevertheless, at the end of the process, one step back is essential. A simple question shall be asked: is the final result in line with what the ATM/ANS sector can deliver?

ATCEUC invites all aviation stakeholders to consider actual ATM/ANS challenges:

- Lack of ATCOs.
- Difficulty in recruitment of ATCOs and ATSEPs with specific competencies;
- Decrease in job attractiveness with ATCO blaming;
- Increased conversion training due to new ATM systems;
- Capacity improvement of training organisations;
- Growing implementation cost of new technologies;
- Overambitious CP1 implementation deadlines.

Considering all of this, how can the proposed RP4 target ranges be regarded as achievable and realistic?

The PRB targets ambitions, except for the year 2020, were never even close to be reached in the past ten years. How to imagine that in 13 months, not only actual

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trends will be reversed but also low delay and flight efficiency performance records will be beaten?

No need to insist on the geopolitical threats associated with growing military activities, blurred economic situation, cost of fossil fuel, evolving regulation linked with climate change. Aviation has always evolved in an uncertain environment, imposing by the way more realism and future proof solutions than other sectors.

At the end, who will suffer the consequences of those refusing to consider reality again and again?

ATCEUC calls for a different approach, to be started and based on operational reality. Targets need to be associated with clear understanding of challenges and the way ahead shall be commonly agreed by those in charge to implement it. It is one thing to push for improvement and another to burden ATM/ANS sector with incorrect targets. Producing long term political aspirational goals is a different exercise and cannot be the basis of short and medium term operational and industrial decisions. What is at stake is the level of staff, the level of investment, the definition of solutions to be implemented for tomorrow. Uncertainties cannot be accepted by stakeholders.

Air Traffic Controllers European Unions Coordination (ATCEUC) was created in 1989 and is currently composed of 33 professional and autonomous trade unions representing more than 14000 Air Traffic Controllers (ATCOs) and Air Traffic Safety Electronics Personnel (ATSEPs) throughout Europe. ATCEUC is part of the "European Union Sectoral Social Dialogue - Civil Aviation" in the air traffic management field and it is recognised as a full member of the ICB. ATCEUC with its experts participates in every work group where the voice of its Members can and have to be expressed: SESAR JU, TSG, EGHD, EASA STeB, EASC, ASPReT, ATM Partners and other workshops or programmes within the framework of EUROCONTROL and the European Commission.