



"[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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An answer to EUROCONTROL Think Paper #19

EUROCONTROL has published its "Think Paper #19", dealing with Capacity Shortfalls, Staffing Problems and ATC Mobility.

ATCEUC appreciates that this Paper is dealing not only with the **unfounded promises that ATCO Mobility and Cross-border operations will miraculously solve all the problems** but mentions some difficulties associated with this topic as well.

ATCEUC agrees with EUROCONTROL's analysis that **at least 800 ATCOs are missing in daily operations in Europe**. Unfortunately, it does not investigate the real reasons that brought Europe to such shortage of ATCOs. While EUROCONTROL states in page 3 that "ANSPs may need to be better incentivised (for example, through the Performance Scheme) in order to provide a service that minimises the overall cost to European aviation (including the cost of delays)", ATCEUC strongly declares that **"The European Commission (EC) shall stop incentivising ANSPs to reduce their ATCO staffing through the cost-reduction pressure created by the current Performance and Charging Scheme"**.

During the COVID pandemic the increased pressure from the Airlines on the EC resulted in the Commission Implementing Decision (EU) 2021/891 where any European citizen can read that "it is appropriate to expect air navigation service providers to adapt their cost bases in an adequate manner in response to the reduced traffic demand". With this decision, the **European Commission created direct pressure on the ATM infrastructure to immediately cut costs even further, which led to some ANSPs stopping hiring, stopping training or cancelling contracts with trainees shortly before they would have acquired their license and laying-off ATCOs or sending them in early retirement.**

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So, will ATCO Mobility solve all these problems? Of course not!

It is interesting to read, that EUROCONTROL sees that “Technological advances have enabled inter-operability of ATC Systems” but doesn’t mention how far from real operations it is these days. In fact, it is fundamental to highlight that the “Cross Border ATC Provision” as a concept is not even in place between different ACCs in the same State. Meaning that if an ACC in a Member State had a complete system failure today, any other ACC from the same Member State is not able to take over their airspace even when they use the same ATM System. If such a concept is not feasible at national level, it is even more unrealistic to think of it between different States.

Even in the same ACC, inter-operability is still a mirage. In France the state-of-the-art 4-FLIGHT system, designed for enroute control, is not ready to communicate with the underneath terminal and approach sectors.

It is also important to dismantle the myths of the four examples EUROCONTROL has presented in its document:

- Maastricht UAC is a fixed ATC Unit that controls a fixed portion of airspace delegated by four Member States. It is not an example of cross-border ATCO-Mobility since Maastricht UAC does not provide ATM services outside its defined geographical scope. In fact, due to safety reasons, intra-ACC Mobility (a concept explained later in this document) is extremely low in Maastricht UAC.
- FINEST project is still a theoretical project between two ANSPs with no observed operational outcome. To the day, Helsinki FIR and Tallin FIR are still controlled by their own ANSPs. ATCEUC invites EUROCONTROL to ask the Ministry of Defence of Finland and the Ministry of Defence of Estonia their opinion of this project. Once you do it, please share it openly with Europe.
- Enroute ATS in Kosovo is fully delegated to Hungarocontrol. Once again, there is no ATCO-Mobility in this case, just a delegation of airspace. Besides the ATCOs in Hungarocontrol, who are fully qualified in providing ATC services in the Kosovo airspace, no other ATCOs can make it, according with the EU Regulation 2015/340.
- Skyguide project is still in its embryonic phase. As stated by EUROCONTROL, Skyguide is still “aiming” and far from having Zurich and Geneva ACCs virtually merged. Funny enough, the bibliographical reference EUROCONTROL used to mention the Skyguide project is just a personal interview presenting a still farfetched blueprint on the project.



It seems as if the authors of this paper are mixing up or confusing several concepts, willfully or mistakenly, to promote a concept that is not feasible or only feasible at high costs.

For ATCEUC, the most important factor in ATM remains SAFETY.

EUROCONTROL omits the fact that each unit endorsement an ATCO has, allows to work on a limited number of control-sectors only. This limit is due to the complexity of each sector, where an ATCO has to receive proper training and has to maintain the proficiency throughout the year in that specific operational setup. In some (and more complex) ACCs, an ATCO cannot even work in every sector of the Unit due to this limit. It is illogical to think an ATCO would be able to work occasionally in sectors where his/her proficiency levels would not match the modern aviation safety standards. In fact, the EU Regulation 2015/340 lays down how this has to happen. Keeping one's competence in any sector an ATCO is licensed for is time consuming and costly and requires some administrative work. Changing the regulations for acquiring and maintaining a valid license will not remove the need for proper training and proficiency of the ATCOs.

Although this safety limit exists, a realistic and efficient ATCO-Mobility is already ongoing for many decades where feasible. It is fair to call it "intra-ACC Mobility", since in every ATC Unit the sectorial configuration is tactically changed during each shift to adapt to the actual demand. Each ATCO is able to switch between **different** sectors during the same shift, and this flexibility is not observed in the pilots' working environment, with which ATCOs are wrongly compared. But, as stated before, this "intra-ACC Mobility" is limited due to safety reasons. ATCEUC is absolutely sure EUROCONTROL is aware of it, considering the correct example of the Maastricht UAC.

ATCEUC highlights that the real problem is the lack of ATCOs in Europe and considers that the unreasonable ATCO-Mobility concepts presented by EUROCONTROL are not the solution. In fact, **ATCEUC believes the proposed solutions by EUROCONTROL would be the most expensive and inefficient way to organise ATM in Europe**, since there are no overstaffed ACCs in Europe. To have Air Traffic Controllers in one ACC working once in a while (meaning: not as efficient as a proficient ATCO would) in a foreign sector would push their own ACC to an understaffed operational situation.

ATCEUC highlights that in this document EUROCONTROL leaves many questions unanswered and many of the identified problems unaddressed.



ATCEUC urges EUROCONTROL to correctly dissect the reasons behind the capacity delays observed in Europe. It is not correct to declare that every capacity problem is caused by the lack of staff. These delays occur when demand is higher than the capacity of the infrastructure, and they can be generated even in an airspace where the ATM service provider is properly staffed.

ATCEUC is of the firm opinion that Cross-Border operations will not solve any of the capacity problems we are facing and will generate safety-related problems that are not aligned with the real purpose of the ATM infrastructure.

Every European Institution and Organization working with the ATM system should instead focus on creating conditions where the ANSPs are able to hire and employ sufficient personnel, foster real interoperability and not to believe in fairy tale solutions presented by dreamy minds that are too far from the operational reality.

Brussels, 22 December 2022

Air Traffic Controllers European Unions Coordination (ATCEUC) was created in 1989 and is currently composed of 32 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.