



The Guild of Air Traffic Control Officers

GATCO Response to CAA/IAA Draft UK-Ireland RP2 Performance Plan Consultation Document

1. Introduction:

GATCO is widely involved in many UK and international activities and discussion groups that influence air traffic management. These activities fall into two categories: 'technical and operations' and 'professional and legal'. GATCO is part of the wider international organisation, IFATCA. IFATCA is a global air traffic controllers association which also has a very solid European presence within SESAR JU, EASA, the EC and Eurocontrol where views are often sought. IFATCA has a strong relationship with ICAO where we have a permanent observer member status in the ANC and where we work with the ANB.

2. Background:

GATCO within IFATCA share the same views of FABs. Namely that they are globally an outdated concept, increasing levels of bureaucracy and therefore cost, whilst creating small "superpower" ANSPs that still have the same problems communicating/ cooperating with others as the existing structure does today.

We believe that a common and harmonised set of procedures, equipment and operating software, leading to a seamless and virtual single ANSP is the most efficient way to create the future of European ATM.

This being said, negotiation and influence within the existing ideas of a future structure remains a priority for our organisation.

3. Safety:

In response to question 3.15;

- What would your organisation consider to be the safety benefits in having a documented policy on JC at FAB level?

A documented and consistent policy on Just Culture across borders is the only way to ensure that levels of safety reporting are coherent to both regulators and that trends can be analysed effectively.

- Is the scope of the Joint Policy Statement sufficient?

GATCO has been actively promoting Just Culture, not only in the past, but also presently where we feel that is not applied effectively around the UK. The model that has been chosen from Prof. James Reason is well documented, although is almost twenty years old! The CAA/ IAA could use this opportunity to break new ground in the analysis of determining the culpability of unsafe acts.

- Are there other areas of JC you consider would be helpful in establishing a greater understanding of its application in relation to ATM throughout RP2?

Just Culture should be a concept that is not only restricted to the “direct operational” staff. In order for any real “culture” to exist within an organisation it should be applied throughout that whole organisation. At what point does the “operational” part of an ANSP or regulator cease to have any influence over the rest of the employees? A Just Culture only applied to one part of a business will inevitably create divisions within that business and a lack of understanding. When and to whom does a senior manager apply the concept of Just Culture, and when does that same manager apply a punitive measure? A unified Just Culture would ensure that everyone is treated in the same unilateral manner.

4. En Route Capacity:

In response to question 4.35;

- Do you consider the adoption of a FAB capacity target in line with the Network Manager Reference Values for the UK/ Ireland FAB appropriate?

GATCO generally supports the capacity targets as outlined. General caution should be exercised so that these optimistic targets do not become a primary focus for an ANSP with safety trending into a second place.

- Do you consider the scope and function of the proposed FAB capacity incentive mechanism appropriate?

We consider that the scope and function of this mechanism to be appropriate. A delicate balance must always be trod, and providing that this mechanism develops a common RP1 theme, then it will be successful.

- Do you consider the proposed approach to incentivisation for the capacity metric C4 appropriate?

A metric that promotes resilience in systems, and therefore enhances overall

safety, is to be encouraged. Any penalties enforced may have a detrimental effect on that ANSP's ability to provide additional capacity.

- Do you have any other views on the FAB or UK-only capacity targets?

A true implementation of the existing concept of an FAB (a concept that we do not agree will be successful throughout Europe) would mean that there should be no specific UK only targets.

5. Environment:

In response to question 5.35;

- Do you consider adoption of the Network Manager Reference Values as FAB targets for the horizontal flight efficiency appropriate for RP2 in the UK-Ireland FAB?

GATCO is supportive of the adoption of these targets. It would be interesting to note whether the IAA have concerns over the combining of these targets at an FAB level when comparing the London TMA and its lateral operational constraints to those of the Dublin TMA.

- Do you consider the approach to incentivisation for the proposed UK 3Di KPI and implementation of a harmonised Transition Altitude of 18,000 ft appropriate?

The harmonized TA and the introduction of the LAMP project will dramatically alter 3Di KPI figures in a positive way and should be encouraged. It should be noted that although NATS' 3Di system is being altered, it would remain different to the way in which other European nations measure their performance in this area. A level playing field will be almost impossible to achieve.

To pressure complex projects through the use of penalties to find solutions that are so radically different to the way traffic is managed at present may well be detrimental to their overall outcome and safety.

- Do you consider the proposed 'cap' and 'collar' calculation as 33% of the par value an appropriate level at which to set the maximum bonus/penalty payments?

Yes

- Do you consider the deadband proposed to be at an appropriate level?

Yes

- Do you have any other views on the FAB or UK-only environment targets?

A true implementation of the existing concept of an FAB would mean that there should be no specific UK only targets.

6 En Route Cost Efficiency UK

In response to question 6.88;

- Do you consider the proposed UK en route cost efficiency targets demonstrate sufficient contribution to and consistency with the EU target for cost efficiency?

It should be strongly reiterated that the EU targets for cost efficiency are based around a projected traffic forecast that may very well not be achieved even at its most pessimistic scenario. This is highlighted in the CAA Chapter 2 “Background” paragraphs 2.33, 2.34 and 2.39.

- Do you have any other views on the UK en route cost efficiency targets?

UK staff costs are mentioned almost exclusively in the document.

6.21 states;

“...IDS, the CAA's consultants on staff costs, provided a significant body of evidence that pay and benefits packages at NERL are relatively high compared to what the market pays for equivalent roles and also that trends over recent years have seen higher increases in average...”

This IDS evidence is not presented within this consultation document and as such cannot be verified or evaluated. There is no indication whether this evidence is solely orientated around the UK employment market (of which there are no ANSPs of similar importance, or whether it was a pan-European study. GATCO is persuaded that only a pan-European study incorporating data from other ANSPs staff costs would provide an adequate benchmark. A like for like ATCO comparison would be meaningful. In an increasingly competitive market and with a single European licence, a risk of expertise leaving the FAB may be of concern should conditions deteriorate for those staff concerned.

GATCO has concerns that if the 10% reduction in ATCO numbers quoted in the document by 2019 are achieved and if the projected (minimum ~8%) increase in traffic is realised, an unhealthy and potentially unsafe trend will emerge with our members working longer hours with more traffic.

As an observation, GATCO as a professional body has noticed over the last decades a pronounced stability in employment relations between NATS and its trade unions. The trade unions have made strong indications that further reductions in numbers and benefits may upset this stability. This lack of stability would be detrimental to the FAB as a whole.

8 Terminal Navigation Services UK

GATCO refers to its response to the CAP1157 January 2014 consultation document where RP2 targets are addressed.

10 Interdependencies

Although there are no formal questions to answer in this section, GATCO would like to highlight that there seems to be less focus on interdependencies in the draft performance plan.

We have highlighted in our response to the EC in the PRB's RP2 target consultation in 2013 our concern over the lack of attention in this area along with those of other stakeholders. The PRB subsequently identified this as an area of concern and requested a study be undertaken. The study highlighted the need for simulations, statistic modeling and probabilistic reasoning. This does not seem to be evident at present in this draft performance plan.

GATCO urges for strong leadership and firm independent oversight by the CAA and IAA in this area.