



Meeting Minutes
FABEC Stakeholder Consultation meeting
RP3 Performance Plan
5 September 2019

MEETING INFO

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0.2	13.09.2019	Incorporating findings FPC	Ference van Ham
1.0	27.09.2019	Incorporating stakeholder comments	

Welcome - Pierre Jaeger, DGCA Luxembourg and President of FABEC Council (2019)

Pierre Jaeger welcomes the participants of the FABEC RP3 consultation meeting.

The purpose of the consultation meeting is to present the proposed FABEC performance targets for the RP3 period to the stakeholders. These proposed targets were developed by the FABEC NSAs and are presented to receive stakeholders' feedback. A final decision will be made on the FABEC targets in the coming weeks, and then the performance plan will be submitted to the European Commission before the end of September. The stakeholder consultation is an important part of the development of the final plan.

Earlier this year, the EU-wide targets for RP3 were adopted by the EU Member States in the Single Sky Committee. The FABEC states considered the agreed targets to be highly ambitious, but they were agreed because there is a need to maintain pressure on the different performance areas and in all parts of the network. But all parties involved – including the States, the Commission and the Network Manager – recognised that it would not be possible to meet the EU-wide targets in all Key Performance Areas and in all parts of the network. Local circumstances should play a clear role in the target setting, and in the evaluation of the targets.

The targets are fixed for a five year period, in a world and in an industry that is very dynamic. The world today looks quite different from what we were expecting when the RP2 plans were written in 2014. There is also no doubt that it will be different in 2024 from what we expect today. The targets of FABEC, and of all EU States, are based on assumptions such as traffic forecasts that can be very unpredictable in reality.

Agenda and objectives of the day – Ference van Ham, NL NSA, Chairman FPC (Financial and Performance Committee) responsible for the FABEC Performance Plan (FPP).

The consultation is based on a legal requirement (Article 10 (4) of Commission implementing regulation (EU) 2019/317 but is also considered good practice. Feedback will be considered for the proposal to be submitted to the EC. Focus today is on targets relating to safety, environment, en route capacity including the respective incentive scheme. The other targets (cost efficiency and terminal capacity) have already been consulted on national level and are not part of this consultation.

The FABEC Council decided in December 2017 to maintain performance planning at FAB level. This is unique in Europe and expresses the strong belief that there is a benefit in a common plan. But coordination and cooperation doesn't mean that all activities are defined and executed together.

The FABEC Council has given its provisional approval to the targets presented today – pending stakeholder consultation.

Following this meeting, FABEC NSAs will consider stakeholder comments and if appropriate adapt the proposed targets which will then be proposed to the FABEC Council for final approval. Written inputs will also be considered if transmitted latest mid-week following this consultation meeting (11 September).

KPA Safety – Björn Schröder, LUX NSA, Member of FPC

Björn Schröder introduces the definition of the Safety KPI according to Annex 1, section 1, paragraph 1.1 of EU 2019/317.

Safety

The key performance indicator for safety is the Effectiveness of Safety Management (EoSM) achieved by the ANSPs. It is measured through a questionnaire, and based on the responses to this questionnaire, a level of A (lowest) to D (highest) is awarded to five management objectives: safety policy and objectives; safety risk management; safety assurance; safety promotion; and safety culture.

In line with the EU-wide safety target as set out in the Commission implementing decision 2019/903 of 29 May 2019, FABEC proposed a safety target for all FABEC ANSPs which is to achieve level D for safety risk management in 2024, and level C for all other objectives.

Today FABEC is very close to the target levels set for RP2. It is expected that the RP2 targets shall be achieved by end of the reference period in 2019.

Based on this it can be expected that FABEC can achieve the EU wide targets for RP3 by the end of 2024. NSAs supervise the RP3 performance permanently and can intervene if the RP3 targets' achievement is at risk. There are different measures put in place to achieve the safety performance targets.

There were no questions.

KPA Environment – Mathias Schallnus, GE NSA, Member of FPC

The key performance indicator for environment is horizontal flight efficiency (KEA): the comparison between the length of the en route part of the actual trajectory derived from surveillance data and the achieved distance, measured as the average extra distance flown (as a percentage = flight inefficiency) (per flight in en route EU airspace).

The following table presents the reference values calculated by the Network Manager as the expected contribution of FABEC to the EU-wide targets as set by the Commission implementing decision 2019/903 as well as the proposed FABEC targets.

	2020	2021	2022	2023	2024
Reference value	2,90%	2,83%	2,75%	2,75%	2,75%
FABEC target	3,25%	3,25%	3,25%	3,15%	3,00%

Though consistency between the RV and the local target is assessed by the European Commission by a mere comparison between these two values, local circumstances shall be taken into account. They are applicable when there are clear indications that the capacity situation in the respective areas will improve. (SSC 71 EC Statement).

In the appreciation of the NSAs such circumstances apply to FABEC.

Thus, the deviation of FABEC environment targets with reference values can be explained by the proven interdependency between HFE and delay as measured by the capacity target. The development of the environment target is consistent with the development of the capacity target.

First analyses tend to demonstrate that eNM measures impacting the summer traffic 2019 by re-routing traffic out of congested airspace had a positive effect on capacity but a negative one on environment. Additional uncontrollable factors (for ANSPs) and interdependencies exist (weather, military activities, financially optimized flight plan and trajectory planning by airlines, etc.).

Several projects, foremost the FRA which shall be implemented in the whole of FABEC by end 2024, will have a positive impact on HFE. Additionally, some other initiatives, notable the FABEC/NM Airspace Design Co-ordination Group (ADCG) will help to improve the airspace structure over RP3 and beyond.

All things considered, the FABEC States propose targets which are less constringent than the relevant FABEC reference values as calculated by the NM but which are considered to be admissible due to the considerable project pipeline which will improve HFE directly and via improving capacity during and beyond RP3.

Questions:

Main issues:	AOs	FABEC
	Airlines consider that the proposed values are not challenging enough and that they don't reflect the investments which should have been made by ANSPs.	There is a lot of uncertainty in the system. Traffic flows, traffic numbers, weather, MIL activities, etc. are largely uncontrollable by ANSPs. The proposed HFE targets are based on historical data and do not only reflect the situation of the last two months.
	The HFE value should be complemented by a VFE value which is similarly important to measure environmental performance.	This needs to be evaluated throughout RP3. It is obvious that environmental performance is one of the major challenges for the industry in the future.

Discussion in detail:

LHG: Some of the measures quoted to improve the mid- to long term environmental performance are questionable, e.g. Berlin airport or a 3rd runway in Munich in 2023. LHG asks to make sure to invest the resources where they are needed.

Mathias Schallnus, GE NSA: They are mentioned because they are in the formal planning.

LHG: The eNM measures have a huge effect from an ecological point of view. Delay went down but all extra costs due to flight inefficiency are on the airlines. He asks how big the impact of the uncontrollable aspects is on the environmental performance. How big will the impact be of the eNM/S measures?

PMG (FABEC ANSPs): explains that it is not clear how the NM calculates the reference values and how they are split between factors ANSPs can control and others which they cannot control. What ANSPs can control are routes but they cannot control how they are used. Circumnavigations are a huge challenge. We are sensible to all external factors. Targets as proposed are challenging and FABEC ANSPs have no reason to believe that they can improve based on what we know today. Overall we have an environmental efficiency of on average over 95% which is a good value. A big issue with this indicator is that because of the overlapping influences of various factors it is impossible to determine the isolated cause and effect based on empirical data.

MetAlliance: Weather and climate change will have a growing impact on aviation. There are long-lasting positive or negative weather phenomena which cannot be predicted on a year to year basis and which did not occur in the past. Vertical flight efficiency could have the same importance as Horizontal flight efficiency to measure environmental impact. The optimal altitude should be part of it. The choice of KPIs thus has

sometimes unwanted effects.

Mathias Schallnus, GE NSA: VFE will not be introduced during RP3 but will be monitored if there is a trend. If relevant it will be discussed in the light of SES 3.

A4E: Supports VFE as an indicator. A4E does not understand the statement that eNM measures are unpredictable. Eurocontrol says that they are well coordinated with ANSPs and thus presumes that they are predictable. The consequences are known according to ECTL. If there is an issue with communication the NM process needs to be reviewed.

PMG: RAD measures were negotiated and coordinated. The impact is to be seen and experienced and evaluated. We have to see how AUs react to the measures and if the impact intended happens. In case of a lack of positive effect, eNM/S19 measures were immediately suspended. It is an iterative process. We speak about 2019 and we don't have any clarity about future RAD restrictions or other summer measures. We don't know for RP3 what traffic levels to expect at which location, thus what measures become necessary, and what the impact on delay will be.

Mathias Schallnus, GE NSA: There is a correlation between delays and HFE. In 2021 capacity improvements should start. However, we don't know how the positive effects will happen. Prediction is difficult.

LHG: what about the Airspace Architecture 2035 Study and the transition plan? What will be the impact?

MUAC: ECTL predicts based on expectations. Reality is different. Filed FLP and real trajectory is different. Targets only look into filed flight plans. There is a huge difference between KEP (performance indicator flight trajectory as planned) and KEA.

Ryanair: Does not understand why the proposed targets are below the reference values. AOs have paid for investments into performance improvements of ANSPs and don't see these improvements in the proposed plan.

Mathias Schallnus; GE NSA: Reference value we received from NM in July. Calculation is not known to us. In the understanding of the States it is more important for AO that delays are mitigated rather than that the HFE value is strict. It is in the interest of AO to have more on time performance.

LHG: LH invested a lot to bring more buffer into the system. It is too expensive. There should be a balance between being on time, environment (flight efficiency) and the cost-efficiency. LH is more and more faced with questions concerning CO2 burn. What kind of signal do we give to the world? We really need a balance.

DFS: we have to focus on capacity first, this leads to better (higher) flight profiles. DFS improved the situation already. We received positive feedback.

MUAC: our airspace is most congested area in Europe. There are also many military zones. Our airspace is coming under increasing pressure by both civ and mil traffic. We will not be able to improve in the next years. It is a scarce resource. We can't buy extra airspace.

KPA Capacity – Stéphane Lafourcade, FR NSA (member of FPC)

The key performance target for capacity is en route ATFM delay, measured as the average en route delay (in minutes) per flight in en route EU airspace. The following table presents the proposed FABEC capacity targets. It also presents the reference values which indicate the expected contribution of FABEC to the EU wide target.

	2020	2021	2022	2023	2024
Reference value	0,69	0,68	0,51	0,37	0,36
FABEC target	3,45	3,88	3,61	2,19	1,78

EU wide capacity performance targets were communicated by the Commission implementing decision (EU)

2019/903 on 29 May 2019. On this basis, NM issued as a break down reference values (RV) for FABEC and the individual ANSPs. The same statement as before applies for the performance targets: local circumstances shall be taken into account by the EC. They are taken into consideration “provided that there is a clear indication that the capacity situation in those areas will improve.”

Proposed targets represent an improvement from current performance forecast made by the NM, while recognising that the measures required to deliver this improvement will take time to materialise. Indeed, towards the end of RP3, the proposed targets are significantly more ambitious than the delay forecast in the Network Operations Plan. Further improvements are planned to be delivered beyond RP3.

A look back at RP2 shows that 10 FABEC ACCs (out of 14) are in the top 20 delay hotspots. During RP2 delays have considerably increased. This can be explained by several factors, many of which are outside of managerial control of ANSPs (e.g. traffic increase of 12%, traffic volatility, weather impact).

There is a big capacity challenge ahead of us. Traffic is expected to continue to increase in RP3. Many initiatives to enhance capacity are already launched but take time to deliver benefits. NOP contains full set of measures to increase capacity. Three levels are to be addressed: tech, HR, network. New system will be implemented but it is equally to be considered that the introduction of such new ATM systems delivering more capacity means a temporary increase of delays. Regarding staff issues mitigation, as an example: DSN and DFS recruit more than 100 ATCOs per year. Training time might be reduced with intermediate qualifications and sectorless training. At network level eNM measures and NM-FABEC collaboration to deliver a new FABEC airspace design should also increase capacity.

Overall there are major uncertainties for NSAs when setting targets. Traffic forecast reliability and higher volatility is one of the main ones, but eNM measures are uncertain too. They need acceptance from all stakeholders and the effects are not all positive, for example regarding environment. Therefore it is uncertain to anticipate future eNM summer plans and their impact.

Social agreement for measures is needed. Negotiations are still ahead of us. Additional ATCO hiring, more flexible rostering or new working arrangements cannot be implemented without the agreement of all stakeholders. All implementations are challenging. All uncertainties need to be taken into account.

The FABEC States consider that proposed targets, which are set below current FABEC NOP forecasts for 2024, are challenging for major FABEC ANSPs. They provide a 50% delay reduction between 2022 and 2024 mainly by implementing new ATM systems and hiring ATCOs. They do not include a buffer for disruptions which are outside managerial control. It has also to be mentioned that there is a strong need to continue cooperation with NM beyond 2020 if we want the targets to remain achievable.

Questions:

Main issues:	AOs	FABEC
	The ambition level is considered too low particularly in the light of recent traffic evolutions which tend to show a downturn in growth. The targets will therefore be easily met and no real changes to the system can be expected.	The proposed targets are based on historical and on official figures. This is the only admissible approach for now since we have no clear view yet on how the improvements over the summer 2019 can be explained and if there really is a trend downturn.
	No value for money.	We base our targets on what we find in the NOP and STATFOR and ANSP expertise. We need more detailed information on the real planning of the AOs

Discussion in detail:

MetAlliance: setting targets for average delay minutes is hiding the real issue: 10% of days in a year are probably responsible for most delays throughout the year. Response is not linear. We need to think outside of the box. The whole aviation system needs to be taken into account. It has to be seen in a holistic way. If you want to cover crazy peaks in demand, price the timing. Steer the end users this way. You can not hire ATCOs for ten weeks a year.

Stéphane Lafourcade, FR NSA: We have to act within the current regulation and the available data. One could even identify few sectors which produce most of the delays. Average delay as an indicator does not provide a clear and full picture but it is the only indicator which is legally binding and is well known and understandable. Some stakeholders started working on alternative indicators (capacity) but it did not materialize. It is true that there is a discrepancy between what the KPI shows and the local operational world.

A4E: peak pricing is not acceptable in a system when there is buffer. Today, the available capacity is below the possible/physical capacity of the airspace (which is what airlines have paid for). Why are not the actual figures (summer 2019) taken into account for the capacity targets? Even if you take a safety margin of 50%, on top of the real values you don't reach the figures suggested for RP3.

Stéphane Lafourcade, FR NSA: We don't know today why we have such low delay figures this summer. We lack analysis of current figures. This cannot be taken as a basis therefore. The only info available we have regarding historical and future trends and forecast is Statfor, NM forecast and ANSP initiatives. We don't know if eNM will be prolonged. We need to commit on targets we are responsible for.

A4E: there is a lack of consistency between environment and capacity KPIs assumptions. Either you take the actual figures or current achievements because you understand them or you don't take them because the analysis is missing. A consistent approach when setting targets is required.

Stéphane Lafourcade, FR NSA: regarding environment the NM indication for RV setting was to take the current achievement and then lower them with 0.5 – 0.55% to set the RP3 targets.

LHG: The proposed targets are shocking. Many possible negatives and uncertainties are incorporated but the positives are not included (especially deriving from the NM). There is a downturn at the moment, traffic clearly slows down. The delay numbers are lower today (clearly in Germany). Difficulties are no longer in the airspace of FABEC but have shifted to the east of Europe (Vienna, Budapest,...). The NM pushing routes out of the FABEC area had impact on Poland and Czech Republic but not to the South East (different stream of traffic).

PMG: What do we want to achieve with the current targets? We want to improve service quality. We derive a trend by looking at historical figures. The NM has the full picture. A target is set by deriving a forecast from historical data, but not just from the last two month. We have a big cloud of uncertainty. This makes it difficult for ANSPs. NM has calculated based on real figures. At the moment we are below their recommendations. We don't understand this. We need to try to understand what happened in the last 2 months. Is it e.g. the US-China crisis? Only after understanding the change of June and July the targets can be determined. To set targets for RP3 we need more solid ground than just looking at summer 2019.

IATA: We challenge the assumptions which were presented. They are within the boundary of the highest traffic forecast. Since 2012 we had a 12% increase in traffic but 288% increase of delay (intermediate PRB report of the day before). Especially FABEC (as a FAB) is the highest contributor to delays.

LHG: We are spending a billion Euro in the FABEC area and we really see nothing being delivered.

LHG: Does not understand how FABEC gets to the numbers. It is difficult to accept them. Reality shows a different picture now. Traffic increase is likely to slow down even more next year. Delay forecast is way above. Where is the effect of the measures airlines and ANSPs are taking? The target is not ambitious enough and not based on the new reality.

Ryanair: Have FABEC measures been communicated to NM? The targets should be realigned.

PMG: We have to take into account (from a scientific point of view) what has happened in the past. The impact of measures is difficult to calculate. New staff will only materialize in 2-3 years. The capacity available in the first two years of RP3 is to a great extent already determined by the decisions already made. Use of delay targets is determined by the decisions taken in the past. Coming from the last 2 years, the proposed targets represent a very demanding level of delay in light of the traffic increase, the unpredicted flow shifts and the saturation level of some ACCs. We struggle with volatility, etc. We don't know how the delays outside the FABEC area related eNM measures may be attributed/ redistributed in the post-ops process or whether the traffic rerouted will flow back to us or not.

Ference van Ham, CM FPC: Since this is a consultation, FABEC NSAs are not here to defend targets at all cost. However, we will also not commit to any changes today. Our aim is to listen to you and consider what it means. We had discussions about what the current situation means for us. The lower delays this summer come as a surprise. We are not sure what the underlying causes are that have led to the current situation. But FABEC States cannot adapt target according to short term variations of delays.

LHG: All AOs are in deep sorrow on what we see. The cost to AO to stabilize the system with additional aircraft cannot be borne indefinitely. We need a better working industry not in 10 years from now but earlier.

IATA: Also RP2 was considered as a transitional plan. We don't see that. In 2016 we identified already that there was a lack of ATCOs. Germany has spent 1 billion on CAPEX. In Karlsruhe there is no traffic increase. The cost of delays only for Karlsruhe is over 500 M€. We as AO cannot accept the plan under these circumstances. How can we rely on the input for RP3? In the last 28 consultations it is always the same: we need more ATCOs, more investments, more capacity. But we don't see any value for that cost, even when the Commission already relaxed the targets. It is very difficult for the AU that finance this to realize not getting the agreed level of service delivery. It seems we are never going to get it. This is a fundamental question. How can we rely on the inputs?

DFS: We reduced our staffing due to financial pressure. We exceeded what we did and have now a staffing issue. We need to know better what our customers are doing. Over recent months, we expected a traffic increase of 3% but the reality is only 1%. This helps us but is at the same time a sign of the volatility we have to cope with. But for the target setting we only have the NOP as baseline, these are our official figures. We have to develop our targets and plans based on this. We don't receive new or different figures from the customers and cannot adapt our planning due to this. We have learnt a lot in RP2. We balanced the KPAs for RP3 considering the inputs of our customers.

PMG: More accommodation of traffic is more revenue gain for the AOs. ANSPs are not getting back any of this.

LHG: With the traffic sharing mechanism, ANSPs also received a fair share of the benefits of traffic growth.

Information on Cost-efficiency at FABEC level – Ana Salas, CH NSA, Member FPC

There will not be any discussion of the cost-efficiency target due to the fact that this was already consulted at national level. RP3 is a period with major developments planned in the main pillars of ANS (airspace, technology, airport, institutional, etc.). Implementation of new ATM systems or upgrades of legacy systems will take place during RP3. Benefits will be visible in RP3 and RP4.

FABEC Financial Incentive Scheme - Jean-Jacques Blanchard, FR NSA, Member of FPC

The main elements of the proposed FABEC en route capacity incentive scheme for RP3 are:

- Performance at FABEC level creates a trigger for awarding a bonus or a penalty.
- In case of bonus or penalty at FABEC level, only ANSPs which have respectively performed better or worse than their contribution are eligible for a bonus or a penalty.
- The amount of the bonus or penalty for an individual ANSP is determined through local parameters.
- The incentive scheme will only be linked to the delays that are under the influence of ANSPs (e.g. due to lack of staffing) and not to delays due to other causes (e.g. weather, industrial action).
- Bonus and penalty will be symmetrical around the pivot value.
- The maximum bonus and penalty will be set at 0.5% of determined costs.
- The dead band in which no bonus nor penalty is defined will be set as wide as possible at FABEC level, in recognition of the volatile nature of performance at current delay levels; the dead band for ANSPs will be set by the relevant NSA(s).

The pivot value will be updated yearly by taking into consideration the annual trend of the reference value

which is available in the NOP release from November year n-1.

Questions:

Main issues:	AOs	FABEC
	AOs question the fact that there should be a bonus for what they consider not good enough performance. Since the proposed target values are low every slight improvement would entitle ANSPs to a bonus. Such a system should also take into account the risk borne by the ANSPs. They consider that ANSPs don't carry any risk under the proposed targets.	FABEC needs stability and the proposed system brings this stability since it is very close to the one applied in RP2. It is a symmetrical system since to incentivize for good performance pushed the ANSPs to make an effort. A pure malus system would not achieve what is expected in terms of balanced approach.

Discussion in detail:

LHG: Bonus/malus scheme is in itself not a good idea. We don't understand that if you perform a little better than what is proposed you would receive a bonus. We think that we should only have a malus scheme to safeguard for poor performance.

Jean-Jacques Blanchard, FR NSA: We want continuity for FABEC. We set up the parameters to keep the symmetrical approach. We don't think that only penalising serves the purpose of improving performance.

A4E: The incentive scheme should reflect the risks. We don't see any risks but only a reassurance of all unknowns for ANSPs. What is the risk left for ANSPs? For what do you need a bonus if you have covered every risk for ANSPs by including and increasing the target value? You should not get a bonus for just doing your job.

Jean-Jacques Blanchard, FR NSA: Incentive scheme is mandatory, it is part of the regulation. We based it also on the past taking into account the RP2 lessons learnt as we don't know what will happen in the future.

A4E: The symmetrical bonus /malus scheme would suppose that the risk is also shared equally. The discussions and clarifications around the target value show that airlines carry 80% of risk. So it should be asymmetric. This approach is therefore not fair. It doesn't reflect the risk sharing.

LHG: Pivot value is not important. What is the baseline? In my company the goals are set for me in order to get a bonus. The customer should set the baseline.

IATA: The targets are based on not achieving the NM target values. We don't understand the pivot values going up and down. Why are we jumping around when we should have more stability in the system with the money put into the system (better technology, more ATCOs). We reward worse behaviour.

Jean-Jacques Blanchard, FR NSA: The breakdown of FABEC capacity targets per ANSP is only an input for the FABEC incentive scheme which is based on the pivot values. The variation of pivot values depends on the evolution of the FABEC capacity targets and its breakdown per ANSP. Figures maybe need more explanation.

LHG: FABEC is only continuing what was proposed 5 years ago. This shows that there is no flexibility in the system. 5 years ago we did not have the same problems. We cannot understand that FABEC continues with a system that does not look into the actual situation. This is the worst situation that you propose. How shall we communicate this to our customers? How can we present this to our management board?

Jean-Jacques Blanchard, FR NSA: Flexibility: 5 years ago we presented RP2 FABEC incentive scheme in compliance with the regulation. This was accepted at the time by the European commission. We apply again what the current regulation requests and allows.

Stakeholder presentations:

Thomas Hellbach, CM PMG for FABEC ANSPs:

The EU-wide targets were calculated as theoretical economic optimum between cost of delay and costs for capacity. They were broken down to become the RP2 Reference values, which were enforced as pure top-down FAB/national targets. Interdependencies across KPAs, the real influence of ANSPs on the indicators and local circumstances were not taken into account. Targets were set firmly for 5 years assuming a sufficient accuracy of the forecasts.

ANSPs see a deterioration of delay (en route average delay per movement) due to: Insufficient coordination between the NM, the ANSPs and the AOs on the traffic development (be it long term or from one season to the other), no reliable traffic forecast (magnitude and location), increased traffic volatility (geopolitical events, better (more dynamic) ad-hoc flight planning) and cost pressure, difficult/impossible to withhold sufficient capacity buffers.

The HFE stagnated because the 2018/2019 summer RAD measures to mitigate delay include horizontal re-routings, the share of overflights changed, data plot density changed and difference between shortest route (measured) and cheapest route (flown).

Volatility is a real challenge and cannot be denied. It makes all planning extremely difficult or almost impossible: Volatility can have numerous facets. An example of Maastricht ACC shows how even usually good delay performers had to struggle in RP2 with the volatility challenges of shifting traffic demand. The problems prevail, regularly consume present staff buffers and are in particular striking at those ACCs operating at the edge of traffic saturation like Karlsruhe and Marseille.

FABEC ANSPs consider the selection of indicators and the incentive scheme prescribed by the regulation as not innovative enough when compared to RP2, and considering the numerous interdependencies within operations, as too one-sided with regards to the stakeholders addressed.

They consider the methodology used to define reference values as misleading concerning the magnitude of the real performance gains that can be exploited.

They strongly support the consideration of local circumstances in the approval process to justify adapted targets as described in the Performance Regulation (EU) 2019/317 and referred to by EU COM in the context of the EU target setting process.

To summarize:

- ANSPs support the proposed Safety Targets.
- ANSPs consider the proposed en route delay targets to be at the edge of achievability and thus as very ambitious. Only when all planned improvements and assumptions play out as expected or better, the proposed targets are achievable.
- ANSPs support the incentive scheme as proposed in the draft FABEC performance plan.
- ANSPs consider the targets for the HFE indicator, in particular for the last two years of RP3, as not achievable, because the capacity optimization measures will override any ANSP effort to improve HFE. Furthermore, ANSPs are unable to forecast the huge influence by factors outside their control (share of overflights; shortest/cheapest route difference).
- Targets equally demanding on capacity and HFE are in contradiction and need to be set considering this interdependency.

Comments AO:

AOs are convinced that uncertainty and volatility apply to all enterprises. It is the system that doesn't work. Aviation will be more volatile in the future. More flexibility is therefore needed generally. Management mistakes have not the same effect for ANSPs and AO. AO demand new ways to manage the airspace. They believe

that ANSPs could have done things to improve the situation but remained passive. Now with RP3 the situation even becomes worse.

Achim Baumann, A4E:

eNM measures due to airspace inefficiencies increased CO2 emissions during summer 2019 by 5.8 per cent, added time and fuel burn, in other words a lot of extra cost for the airlines. AOs want user preferred routes and expect that FRA will bring this as the norm. A4E would not like ANSPs to complain about being used by the regulation but use as a tool for improving their services. Why didn't States push for change of the regulation? Overall the cost is not in line with the benefits respectively the service provided to airlines respectively. The process between ANSPs and ECTL seems to be broken and clarification is required. Targets are too much in the comfort zone of the ANSPs and the risk is more on the side of AOs. As a pro-active way forward ANSP/states should address hotspots identified by the Airspace Architecture Study and the transition plan immediately, answer the digitalization challenge and prepare for new business models.

- In the view of A4E the proposed targets lack ambition. The proposed plan makes airlines pay for a service level that is not provided
- Targets are not ambitious or challenging:
 - Environmental targets (KEA) will lead to increase of emissions
 - Capacity targets will allow 100 million minutes of delay
 - Cost will increase without providing the service required
- The incentive scheme will reward underperformance
- The investment plan does not address the current airline needs.

A4E states that FABEC member states are about to approve weakest performance targets ever, and asks for NSAs to

- Challenge air navigation service providers (ANSPs) to deliver the service required by the airlines
- Set ambitious targets to support the challenge
- Promote desired behavior, improvements and best practices
- Ensure that ANSPs deliver both performance and investment plan.

ANSPs on the other hand should:

- Deliver a consistent and cost-efficient service
- Focus on providing operational and cost benefits in all performance areas
- Plan, consult and justify investments based on airspace users needs
- Invest as agreed
- Ensure appropriate staffing resources and adapt to changing requirements

A4E formulates a catalogue of demands which mirrors what has been said earlier.

Rory Sergison, IATA:

IATA has participated in 23 consultations which showed all the same picture. Looking back at RP2, IATA states that Performance targets for Environment and capacity have not been met; that there is significant underspending of determined cost in RP2 by EUR -382m and significant economic surplus from en-route activity of EUR 373m. IATA questions the benefits of enhanced cooperation and integration across borders and asks what the added value of FABEC really is.

Concerning RP3 IATA states that the same borders, same routes and same roles remain but with more cost. IATA observes that cost developments lack transparent justification and CBAs which leads to a lack of trust for airspace users.

On the different proposed targets, IATA states:

Safety:

- The intention to meet the EU Wide Safety Targets is strongly supported
- Some data sharing to date, but no identified synergies leading to cost-efficient or more effective oversight/ application
- EoSM, RAT (GND/ OVL), JC progressing at different speeds
- Transparency of individual NSA and ANSP proposal needed

Environment:

- KEA target not in line with Reference Values is strongly opposed
- ANSPs must keep building efficient airspace and watering down environmental targets will increase CO2 emissions.
- Figures do not reflect abolishing mitigation measures in 2021 due to investments/promised ATCO availability
- Projects planned in order to deliver must be prioritized
- Historical performance suggests little confidence in FABEC to deliver
- Robust plan and commitment at ANSP and state level is essential

Capacity:

- Enroute ATFM delay not in line with Reference Value is strongly opposed
 - Proposed value for 2020 is 5 times the reference value
 - 400% deterioration
- Does not reflect 2019 reality and removal of mitigation measures in 2021 due to investments/promised ATCO availability etc. NM delay predictions are over-estimated as a baseline.
- Current investment and costs increase are sufficient to close the capacity gap.
- Projects planned to deliver are not identified

Incentive scheme:

- CRSTMP limitation is not supported
- In the case of FABEC a Penalty only scheme should be developed to manage performance
- Achievement of both FAB and individual State targets must be the priority, this will drive the changes required by Airlines
- Current Incentive Scheme targets not supported as its actually rewards underperformance. Bonus should be only allowed if there is a real improvement and targets are challenging enough.

Ference van Ham, Chairman FPC thanks all speakers and participants. All are welcome to send written input by 11 Sept. All presentations will be published on the FABEC website (done as of 6 September 19).

The Consultation meeting was closed at 15.30.