Description of the issue*

What is the problem? And why is it a problem? Provide a problem statement for the issue.

For safety issues only, if there are several scenarios that are relevant, please list them.

The absence of detailed training and competence requirements and guidance for ATM staff other than ATCOs and ATSEPs creates an uneven playing field for Air Navigation Service Providers and those staff with safety related duties. It is entirely possible that due to the lack of a harmonised approach, these staff might be under-competent/undertrained and cause safety issues.

One could imagine a failure in the provision of training to different professions. This could be the cause of a safety failure. It is important that all actors of the aviation safety chain are aware of the chain they are part of so that lack of cross training and appreciation of other roles is a safety hazard. Situational awareness might get impaired when staff do not understand the roles and tasks of other actors of the safety chain.

EASA had in the past included in its rulemaking program, tasks mirroring all rulemaking tasks on technical requirements in the domain of air traffic management to cover all competence related issues. Then the Agency contracted a consultant to deliver a study about this matter and then the ATM social partners committed to advise EASA on the way forward. This candidate safety issue is to put the matter back in EASA's scope. The EPAS has a gap as there is nothing currently addressing the ATM profession (outside of ATCO and some areas of ATSEP) tasks and the competence of staff performing those duties.

Lack of evidence that there is no safety gap in current set up of ANSPs:

There has never been an evaluation process to determine that all safety related tasks are sufficiently trained. And that competence can be assured. There is a need to make sure there is no gap. Training should be specified and harmonised for all roles/tasks that cover safety related aspects.

The wider context is a changing environment. Not just with new technology, but with commercial organisations as well. The industry and safety regulators

need to understand the impact of this. Change management needs to be included and we have an opportunity to be proactive rather than reactive.

Recruitment? New competence and skills?

Requirements for recruitment could be out of date. Conversion training and the need to establish a level playing field on staff competence is required. This may lead to the creation of a labour market. Standardisation and harmonisation are required in order to achieve a commonality.

Request EASA to have a clear vision of existing ATM tasks and what the competence schemes for those tasks are.

Affected stakeholders*

Describe who is affected by the described issue, what is affected (e.g. aircraft types, constitutes or equipment, or type of operations and organisations), and, if applicable, specify in which flight phases and circumstances.

Key stakeholders : ANSP, ATM staff, Training Organisations.

Secondary affected stakeholders : NSAs, airspace users and ultimately passengers. Military authorities.

Affected rules*

Describe which rules are affected by the described issue.

At least : ATCO IR 2015/340

And EU Reg. 2017/373

Potentially also : EASA BR

255/2010 ATFM (mentions competence)

677/2011 NF IR

Regulatory material stemming from RMT 720 on cybersecurity

Sources & Rationale*
What triggered the identification of the issue? Are there data, studies or some other evidence available?

ESARR5 set overall requirements.

ICAO requirements for ATCOs but also flight procedure designers and some other specific functions.

Unpopulated annex in EU Reg. 2017/373

Understanding of the whole picture – where are the gaps? Know what the safety concerns are.

IFAIMA study to assess where we are in terms of competence scheme for AIS/AIM.

The study ordered by EASA, even if it lacked a proper methodology, is using the Accident-Incident Model developed by Eurocontrol for SESAR and which has since been renamed the IRIS model. Using this safety model was a good idea but how to use it was further refined by the ATM social partners with the task safety impact assessment technique (TSIAT) which was presented to EASA in dedicated meetings. Limitations of this approach were identified for tasks linked to non-commercial aviation (which is at the moment the only focus on the IRIS model) and to the tasks happening after the incident (mostly linked to alerting service) for which EASA should ask Eurocontrol to help. How to build on various tasks to get to functions and ultimately to requirements is also an unsolved issue.

Preliminary proposal to solve the issue*
- What would be your proposal to solve the issue?

First step is to get a list of all ATM/ANS tasks from the various functions. EASA should be able to list the whole spectrum of the ATM task with the support of Eurocontrol and potentially SESAR.

Request the refinement of the IRIS model to cover all types of airspace users to cover all ATM/ANS tasks.

Identify the existing safety gaps using the TSIAT methodology extended to cover all safety related tasks.
Identify the need to create level playing field.
Identify the interdependencies between the safety related tasks.
Develop the appropriate regulation/AMC/guidance material to tackle the identified gaps involving the ATM social partners and other PSOs.

Preliminary cost assessment to solve the issue*
- What would be the potential estimated implementation costs to solve the issue?
- Please describe the type of costs which could occur? (technical solution, training, procedures, …)

Cost varies depending on the current state of play, could even be a cost reduction (cost of not having a regulation). Drafting the training scheme and realising it. Initial and continuous assessments. Loss of man hours during training phases.

Our proposal is a risk based approach, all associated costs are actually investments and cost of appropriate safety level.

We believe that most of the training required is already happening in an unharmonized manner and with a lack of evidence supporting the training decisions taken.

Potentially there can also be a need for investment on systems to reach the expected level of service.

Preliminary benefit assessment to solve the issue*

- What would be the potential estimated benefits if the issue is solved? (avoided unnecessary workload in hours or man-days, operational benefits [please describe them], …)

The main benefit of this proposal is to have an harmonised and measurable safety assurance.

It also offers the possibility of mobility of personnel around Europe, increased flexibility in staff management, standardisation of competences allowing improved cooperation, possible reduction of training costs due to standardisation and harmonisation of training schemes.