IFATCA

INTERNATIONAL FEDERATION OF AIR TRAFFIC CONTROLLERS' ASSOCIATIONS

www.ifatca.org

EUR

RP5 PERFORMANCE & CHARGING SCHEME REFORM

IFATCA Position Paper for Reference Period 5 (June 2026)

POSITION PAPER

IFATCA is the recognised international organisation representing air traffic controller associations. It is a non-political, not-for-profit, professional body that has been representing air traffic controllers for 65 years, and has more than 50,000 members in over 130 countries. In the European Region IFATCA represents Member Association from 42 countries.

IFATCA POSITION PAPER

RP5 Performance and Charging Scheme Reform

50,000	130+	42
ATCOs represented worldwide	countries with IFATCA member associations	countries whose controllers operate Europe's airspace

1 Introduction

The International Federation of Air Traffic Controllers' Associations (IFATCA) welcomes the opportunity to contribute to the consultation on the future performance and charging scheme for Reference Period 5 (RP5). Our members experience the direct operational consequences of the regulatory framework that the Performance and Charging Scheme creates.

IFATCA's central finding, consistent across its RP4 analysis (December 2023) and the joint press release with other professional staff organizations (May 2025), is unambiguous:

> *The European ATM capacity crisis is partially a technology and efficiency problem. Mainly it is, however, the direct result of a performance framework that systematically penalised workforce and capacity investment while the ATCO labour market remained fully liberalised. This structural asymmetry must be named and corrected in RP5.*

RP5 represents the most significant regulatory moment for European ATM since the performance scheme was introduced in 2012. The decisions taken in the RP5 implementing regulation will govern ANSP financing from approximately 2030 onward and will shape whether European aviation can meet its capacity, sustainability, and resilience ambitions for the decade ahead.

IFATCA's position, set out in full in this paper, is structured around five reform needs and four performance area assessments with concrete asks for RP5.

Contents

2 Assessment of the Current Performance Scheme

2.1 The Performance Scheme: Design Intent and Historical Record

The Single European Sky performance scheme was introduced with SES II in 2009 and first applied operationally in Reference Period 1 (RP1, 2012–2014). It was designed as a 'sunshine regulation' — a transparency and target-setting mechanism suited to a system without major external disruptions and with a constant traffic growth trajectory. The scheme has now completed three full reference periods (RP1–RP3) and is mid-way through RP4 (2025–2029).

The SES initiative is nearly 25 years old. Despite successive reference periods, many of the structural deficiencies identified at the outset persist: airspace fragmentation, suboptimal routing, chronic ATCO shortages at network bottlenecks, and a gap between technological ambition and operational deployment. IFATCA's 2019 whitepaper 'SES III: Mission Possible?' identified five root causes and five recommendations. Additionally, we have taken the development of complex adaptive systems into account which is the basis for our current engagement.

The COVID-19 pandemic stress-tested the performance scheme far beyond its design parameters. The risk-sharing mechanisms proved partially effective during the crisis, but the scheme's embedded assumptions — stable traffic growth, crisis-free operations, ATCO workforce adequacy — were exposed as structurally fragile. The Ukraine conflict has added a second major external shock that the scheme was not designed to absorb.

2.2 Overall Scheme Assessment: Complex, Burdensome, and Producing Unintended Outcomes

IFATCA's overall assessment of the current performance and charging scheme is that it is excessively complex, disproportionately burdensome particularly for smaller ANSPs, and has systematically generated unintended outcomes in the two areas that matter most for European ATM's future: cost-efficiency and capacity.

The scheme's complexity manifests itself at every stage: in the preparation of performance plans, which requires substantial administrative effort for limited operational benefit; in the assessment of those plans by the PRB, where interpretive ambiguity has replaced regulatory clarity; and in the monitoring and incentive mechanisms, which measure proxies rather than operational outcomes.

IFATCA rates the overall Performance and Charging Scheme as: Very Complex. The administrative burden is disproportionate, the KPIs measure proxies rather than outcomes, and the scheme has produced systematic unintended consequences in cost-efficiency and capacity.

2.3 Assessment by Performance Area

Performance Area	IFATCA Assessment Summary	RP5 Position
Cost-Efficiency	Counter-productive outcomes: drove workforce attrition, not genuine efficiency. DUC benchmarking penalises investment.	**Complete Revision**
Capacity	Disconnected from NOP. ATCO staffing metric not actionable. Did not prevent the ATCO shortage crisis.	**Major Adjustments**
Environment	KPIs remain proxies. KEA measures filed route efficiency, not actual trajectory or benefit-pool management.	**Complete Revision**
Safety	Declining visibility. Granularity lost over successive periods. Safety KPIs cannot reveal genuine system safety trends.	**Major Adjustments**

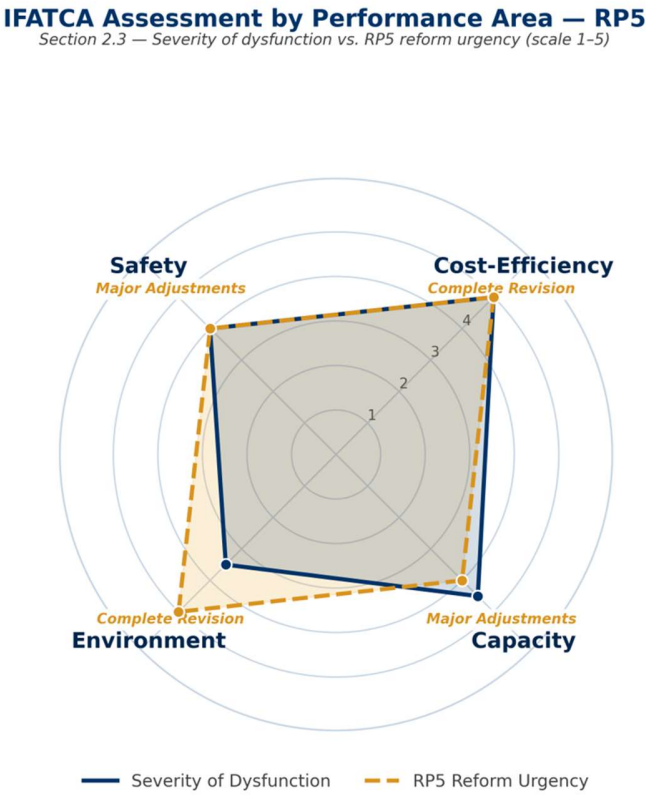

Figure 1 — Spider Analysis of the Section 2.3 Assessment

The chart above translates IFATCA's qualitative assessment in Section 2.3 into a comparative visual: the navy line shows the severity of dysfunction IFATCA identifies in each performance area, and the orange dashed line shows the corresponding reform urgency requested for RP5 (5 = Complete Revision, 4 = Major Adjustments). The two lines track closely across all four areas — underlining IFATCA's position that the scale of reform needed is proportionate to the scale of dysfunction observed, not a separate or negotiable variable.

2.4 Cost-Efficiency: A Counter-Productive Regulatory Outcome

2.4.1 What the Scheme Produced

The cost-efficiency component of the performance scheme has been the most consequential — and the most damaging — element of the regulatory framework. The use of the Determined Unit Cost (DUC) as the primary cost-efficiency KPI, assessed on a year-on-year reduction basis and benchmarked against comparator ANSPs, created a powerful and perverse incentive:

> *"The fastest way to reduce DUC is to reduce the workforce."*

This is precisely what has happened through RP1 to RP4. ANSPs reduced staffing levels, delayed recruitment, and constrained training pipelines because that was the most direct path to meeting their cost-efficiency targets. The result was the ATCO shortage crisis that began manifesting in 2017, became acute in 2022–2023, and continues to constrain European network capacity today. The delay cost to the European economy from this avoidable capacity constraint is measured in billions of euros annually.

IFATCA's analysis, corroborated by the joint press release with other professional staff organizations of May 2025, identifies a critical failure at the RP4 assessment stage that is still active: the European Commission is applying cost-efficiency benchmarking in a way that prevents several States from increasing capacity precisely when demand is rising sharply. ANSPs that chose to invest in innovation, digitalisation, ATCO training, and workforce resilience are being penalised under an assessment framework that treats those investments as inefficiency rather than as the foundation of future capacity.

2.4.2 Specific Failures of the DUC Mechanism

- The DUC benchmarking methodology does not adequately distinguish between cost reductions achieved through genuine operational efficiency improvements and cost reductions achieved through workforce attrition. These are categorically different outcomes — one strengthens the system, the other degrades it.
- The current interpretation of what constitutes an 'investment to expand capacity' is ambiguous and inconsistently applied. This ambiguity deters ANSPs from making the long-term investments in training, staffing resilience, cybersecurity, and SESAR technology deployment that the ATM Master Plan requires.
- Training costs for new ATCOs — a 3-to-5-year process from initial selection to operational qualification — are not consistently recognised as capacity-expanding investments. This means the costs of rebuilding a depleted workforce are treated as the same category as running cost increases, creating a systematic disincentive to rebuild.
- The risk-sharing mechanism, though it partially worked during COVID, was designed for a crisis-free world of constant traffic growth. It does not adequately address the ATCO labour market reality: when staff migrate to higher-paying ANSPs, the losing ANSP faces cost pressures it cannot fully control, creating a structural disadvantage in DUC benchmarking.
- Write-offs of legacy systems during digitalisation transitions — an inevitable cost of SESAR technology deployment — are treated as cost inefficiency rather than as part of the investment pathway, creating a systematic disincentive to modernise.

- The ATCO migration phenomenon — controllers moving from lower-paying to higher-paying ANSPs — is a direct consequence of the performance scheme's financial rigidity combined with a fully liberalised labour market. This structural asymmetry is not captured in any cost-efficiency KPI, yet it materially affects ANSPs' ability to control their cost base.

2.4.3 The Current RP4 Crisis

Specifically, training costs, staff resilience measures, preparation for the anticipated wave of retirements among the ATCO workforce, and investments in CP1/CP2 deployment must all qualify as capacity-expanding costs and be excluded from the DUC benchmarking penalty mechanism. The distinction between 'efficiency-seeking' cost change and 'capacity-expanding' cost change must be made explicit and legally clear in the RP5 implementing regulation.

In general IFATCA questions the existence of a cost efficiency target in the current environment. It is strange that when an ANSP achieves the cost-efficiency target that it gets less income. If it misses it, then it gets penalised. The current risk-sharing mechanism is based on a volatile traffic forecast system, which cannot be influenced in reality by the ANSP and has led to an overall (TOTEX, see PRR report 2025) increase of the costs for the user and a reduction of performance by the ANSP.

2.5 Capacity: Disconnected from Operational Reality

2.5.1 The NOP Disconnect

The capacity performance area has failed in a different way from cost-efficiency, but with equally damaging consequences. The primary failure is the systematic disconnect between national performance plans and the Network Operations Plan (NOP). Performance plans were prepared largely independently of operational network planning, resulting in capacity commitments that did not reflect what the network needed — and creating performance assessments that bore little relationship to the capacity crisis that was building.

This was not a failure of goodwill on the part of individual ANSPs. It was a structural design failure: the performance plan drafting process did not require consistency with NOP Y+1 commitments, and the KPIs did not track whether NOP-committed capacity was being delivered. Performance plans were, in IFATCA's assessment, largely window dressing — documents that satisfied a regulatory requirement without creating operational accountability.

2.5.2 The ATCO Staffing Metric Failure

The measurement of ATCO staffing levels in performance plans did not prevent the ATCO shortage crisis. The metric was not actionable enough to create early warning of developing shortfalls, and the performance plan assessment process did not treat ATCO availability as a leading indicator of future capacity constraints.

IFATCA's members have a direct professional perspective on this: the ATCO shortage was visible to controllers on the ground years before it became a capacity crisis in delay statistics. Fatigue levels were rising, overtime was increasing, and experienced controllers were leaving the profession — all signals that a workforce under stress was heading toward a capacity cliff. None of these signals were captured by the performance scheme's monitoring indicators.

The delay in introducing innovative measurement approaches — postponed from RP3 to RP4 for political reasons and apparently deferred again to RP5 — has allowed the capacity crisis to deepen without adequate regulatory response.

2.5.3 The Real Capacity Problem

Across Europe, air traffic controllers face high workloads, extended working hours, and persistent staffing challenges. This operating environment is contributing to rising levels of disengagement, fatigue, and an observable increase in sickness-related absences, which in turn further strain service continuity and workforce resilience. Some trained professionals are choosing to leave the profession entirely. Compounding the problem is the lengthy and complex process of training new controllers — becoming fully qualified can take several years, meaning that the consequences of recruitment delays or missteps today will be felt well into the future. Short-term efficiency must not blind us to the systemic risks this creates.

2.5.4 Delay Attribution

The attribution of delays through delay codes (capacity, weather, staff, etc.) did not fulfil the desired outcome. The bonus/malus scheme led to a reality where traffic regulations were avoided and the risk of airspace congestion was taken. In addition to that, the current system favours very late restrictions as a regulation from one centre could safeguard another and therefore avoid a delay attribution. This obviously is to the disadvantage of the regulating centre. Finally, the delay codes are not used in a transparent manner. This leads to the result that EUROCONTROL data becomes less reliable.

2.6 Environment: Proxy Measurement Without Real Impact

2.6.1 The KEA Limitation

The Horizontal En-route Flight Efficiency (KEA) metric remains a proxy for environmental performance. It measures the efficiency of filed flight plans relative to the great circle distance — a metric that captures some aspects of route planning efficiency but does not measure actual trajectory efficiency, vertical flight efficiency, benefit pool management, or the ATM system's contribution to meeting aviation's climate obligations under the EU's Fit for 55 framework.

The ATM contribution to aviation's climate impact is not limited to horizontal route efficiency. It includes vertical profile optimisation, continuous descent approaches, the use of climate-optimised trajectories that may trade horizontal efficiency for reduced contrail formation, and the management of the benefit pool through collaborative decision-making. None of these are adequately captured by KEA.

2.6.2 The Climate Ambition Gap

European aviation faces binding climate commitments. The ATM system has a meaningful contribution to make — but only if the performance scheme creates incentives for that contribution. The current environment KPIs do not create those incentives. ANSPs optimising for KEA are not necessarily optimising for climate outcomes, and in some cases the two objectives may conflict.

Climate-optimised trajectories require airspace flexibility that is currently constrained by the civil-military coordination framework. The environment KPIs cannot incentivise climate-optimised routing without corresponding changes to the Network Functions Implementation Regulation (NFIR) — the two regulatory workstreams must be aligned.

IFATCA calls for a complete revision of the environment KPIs for RP5. The KEA metric may be retained as a baseline, but it must be complemented by measures of actual filed-versus-flown trajectory deviation, vertical efficiency, systematic benefit pool management, and consistency with climate-optimised routing frameworks.

> *"RP5 provides the unique opportunity to start overall again, concentrate on the network, define what is the real 'green trajectory' which needs to be influenced, and start to set targets at the flights from 1500 km and above."*

The EC together with the PRB has not been able to define what is the climate contribution ANSPs can realistically provide. The shortest route, as currently used? The fuel-optimised trajectory (CO_2)? The climate-optimised trajectory? Further, the PRB — by breaking down the overall EU target into national KEA and KEP — still does not address a meaningful climate contribution of ATM to reducing the potential pool in CO_2 (from a maximum of 10%). That has to change.

2.7 Safety: Declining Visibility into Real System Safety

2.7.1 The Granularity Problem

Safety monitoring under the performance scheme has lost granularity over successive reference periods. Key leading indicators that IFATCA regards as operationally meaningful — including staffing adequacy indicators, fatigue-related absence rates, near-miss taxonomy trends, and runway incursion severity distributions — have been removed or diluted. The current safety KPIs, focused on the minimum level of effectiveness of safety management, are insufficient to reveal whether the European ATM system is genuinely becoming safer or merely recording fewer reportable events.

This distinction matters enormously. A reduction in reported occurrences can reflect genuine safety improvement — or it can reflect reporting fatigue, changing reporting culture, or the normalisation of lower-level safety events that are the precursors to serious incidents. Without granular leading indicators, the performance scheme cannot distinguish between these interpretations.

2.7.2 The Incentive Problem

IFATCA is concerned that the integration of safety monitoring into the performance plan framework creates incentive effects that are incompatible with genuine safety accountability. Where safety monitoring indicators are linked — directly or indirectly — to financial consequences under the performance plan assessment, there is a risk that they are treated as targets to be managed rather than as signals to be acted upon.

Safety monitoring must be decoupled from performance plan financial incentives in RP5. Safety is not a performance variable to be optimised alongside cost-efficiency and capacity — it is the non-negotiable foundation upon which all other performance is built.

3 IFATCA's Five Priorities for RP5

Priority 1 — Redefine Cost-Efficiency to Protect Investment in Capacity

The current KPI framework measures performance outcomes but does not adequately assess the underlying capabilities of Air Navigation Service Providers (ANSPs) to sustainably achieve and maintain those outcomes. Indicators focused solely on cost-efficiency, delays, or route efficiency fail to capture critical enablers of performance, including staffing adequacy, training capacity, workforce resilience, fatigue management, and investment in future capacity.

RP5 should therefore introduce a set of leading indicators that assess an ANSP's capability to deliver and continuously improve performance over time. A more balanced framework, combining outcome-based and capability-based KPIs, would provide a more comprehensive and accurate reflection of operational reality.

The most urgent reform needed for RP5 is a fundamental redefinition of what constitutes cost-efficiency in the ATM context. The current DUC-based approach treats ATM as a commodity service where year-on-year cost reduction is the primary metric. This is wrong: ATM is a safety-critical infrastructure with long investment cycles, high human capital requirements, and significant public service obligations.

Priority 1: *IFATCA proposes the discontinuation of the cost-efficiency framework as a whole, for the benefit of capacity targets. If this is seen as too ambiguous, IFATCA asks for specific, binding changes to the cost-efficiency framework in RP5.*

- Redefine capacity-expanding costs: ATCO recruitment, training, retention and resilience costs must be explicitly protected. Losing even a small number of validated controllers (specifically ACC) has a disproportionate impact on operational capacity and safety resilience.
- Consider alternative economic regulation approaches — including Total Expenditure (TOTEX) regulation or revenue cap mechanisms — that recognise the long-term infrastructure nature of ATM investment.
- Recognise that ATM is part of critical infrastructure and, for the en-route part, has a dominant monopolistic character. RP4 has shown the limits of the regulatory scheme to capture such bodies without negatively affecting quality of service.
- Adjust traffic risk-sharing mechanisms to explicitly recognise ATCO labour market reality. ATCO migration shall not be presented as an acceptable market-balancing mechanism — ATCOs are locally trained, endorsed and validated, and their loss can significantly weaken capacity resilience, especially in smaller ANSPs.
- Publish clear, legally binding interpretive guidance on what constitutes an 'investment to expand capacity' before RP5 performance plans are drafted.

- Introduce temporary performance waivers for ANSPs undergoing major transformation programmes, including CP1 and CP2 deployment, SESAR technology transition, and major infrastructure replacement.

Priority 2 — Align Capacity KPIs with the Network Operations Plan

The disconnect between national performance plans and the Network Operations Plan must be corrected as the primary structural reform of the capacity performance area. IFATCA's position is that the NOP should become the operational backbone of capacity performance assessment in RP5.

> ***Priority 2:*** *Capacity performance should be assessed against NOP commitments, actual validated ATCO availability, staffing adequacy, overtime dependency and fatigue-related absence indicators — not retrospective delay statistics alone.*

- Align capacity KPIs directly with NOP Y+1 commitments. Performance plans should be required to demonstrate consistency with those commitments before approval.
- Introduce monitoring indicators that track ATCO availability — not just sector capacity — as a leading indicator of future capacity constraints. The ATCO shortage was visible in workforce data years before it became visible in ATFM delay statistics.
- Restore meaningful ATFM delay attribution monitoring, using EUROCONTROL Network Manager data as a primary accountability tool, with clear escalation procedures.
- Include delay attribution to the Network Manager. In light of NFIR implementation, the Network Manager must be able to take responsibility for delay created under its own influence.
- Ensure the alert mechanism triggers when NOP-committed capacity is not being delivered — not only after delays have already accumulated. Proactive capacity monitoring must replace reactive delay counting.
- Introduce staffing adequacy as a formal monitoring indicator, including fatigue-related absence rates and overtime dependency metrics, as leading indicators of emerging capacity risk.

Many ANSPs report unreliable FTE figures to the EUROCONTROL ACE benchmarking report, particularly for ATCOs in operations. Some small FIRs are exposed to network-driven traffic flows and late restrictions imposed by other centres; RP5 must ensure transparent delay attribution and avoid penalising an ACC for network effects outside its control.

Priority 3 — Replace Environment Proxy KPIs with Genuine Trajectory Efficiency Measures

The complete revision of environment KPIs is a clear position of IFATCA for RP5. The KEA metric has served its purpose as a baseline measure but cannot carry the weight of European aviation's climate ambitions for the next decade.

Priority 3: *Replace KEA and KEP with Gate-to-Gate metrics, set and managed at the network level — not as counterproductive national targets.*

- By nature, the environmental target has to be set and managed at the network level.
- Replace KEA and KEP with Gate-to-Gate metrics.
- Use RP5 as the opportunity to define what shall be influenced in future: the shortest, the most fuel-efficient, or the climate-neutral route?
- Measure ANSPs against network contribution for flights above 1,500 km.
- No national targets that are counterproductive from a network-centric point of view should be proposed in RP5.
- Establish a mandatory route selecting service by a centralized entity (eg. Network Manager)
- Build in mechanisms to remain flexible with restricted airspace due to military activity, higher-altitude operations, space launch activities, and weather impact — best managed by the Network Manager's weather cell.
- Introduce consistency assessment criteria verifying that environment performance plans are coherent with Network Operations Plans and the civil-military coordination framework.
- Reward ANSPs for making airspace available for climate-optimised trajectories — not penalise them for the operational complexity this creates — aligning with NFIR Function 1 on flexible use of airspace.
- Align environment KPI development with the EU Fit for 55 framework and the requirements of CORSIA.

Priority 4 — Restore and Strengthen Safety Monitoring

The context for safety in ATM over successive reporting periods is evolving. Increasingly safe and resilient performance is contingent upon the interplay between the panoply of competing demands that ANSPs and NCAs confront. The consequence of this is that ANSPs will make business decisions that satisfy, at the highest level, the tenets of the SES Performance scheme. Consequentially, trade-offs will need to be made. These trade-offs are substantive as well as structural and thus hold the potential to influence the ability of the operational capacity and capability in ways that degrade or atrophy service provision.

As an exemplar of the consequences, we use the implementation of technological innovation where to achieve the envisaged financial cost benefit gains, training of ATCOs, ATSEPs and support staff is continuously limited to the lowest practicable consistent with optimising or maximising the cost benefit values. Our experience with the implementation of higher levels of human-computer interaction is that the commonly held belief that such designs reduce training times to achieve competence has proven to be wildly optimistic.

IFATCA believes that the safety KPA needs to fully represent the decisions to resolve competing demands and the ensuing trade-offs as well as, crucially, the effects of interdependencies.

Priority 4: *Safety KPIs must function as pure accountability mechanisms — not as variables in a financial optimisation problem. It should move beyond foundations on outcomes but include functions that embrace corporate and governance accountability mechanisms as well as provide meaningful interpretation of distal organisational decisions on the proximal operational functions of service delivery and the capacity and capability to adapt.*

- Restore granularity to safety monitoring by reinstating or establishing leading indicators that provide the means to examine the effects of competing demands on safe and resilient operational performance inter-alia staffing adequacy metrics, fatigue-related absence rates, mismatches between operational staffing levels and demand etc.
- Implement Safety Key Performance Indicators, as proposed in NPA 2019 (10)C Component 6, Study Area 18 Managing the interdependencies of complex operational environments and competitive business models. Safety performance metrics should include near-miss taxonomy trends, and severity-weighted occurrence distributions as well as the contributions of organisational trade-offs as well as how these are amplified through operational tactical strategies used at strategic and tactical levels.
- Decouple safety monitoring completely from performance plan financial incentives. Linking safety monitoring to financial incentives risks under-reporting, normalisation of degraded conditions, and loss of trust in occurrence reporting.
- Introduce a clear escalation framework for deteriorating safety indicators that operates independently of the financial performance assessment track. The PRB must have the authority and the obligation to intervene on safety grounds regardless of the financial performance picture.
- Ensure that safety monitoring frameworks are developed with full involvement of operational staff representatives — including IFATCA. The operational perspective is one that is able to provide perspectives and dimensions of operational praxis that is hidden. The reality of the people who experience the safety consequences of the performance framework directly is one that can provide authority as well as meaning of service provision at times of changes in the sources of performance variability that requires adaptation in novel ways.

Priority 5 — Reform the Governance and Process Framework

The performance plan drafting and assessment process is excessively burdensome, particularly for smaller ANSPs, and does not adequately involve operational stakeholders in a meaningful way. Process reform is necessary to make the scheme workable and legitimate.

Priority 5: *Stakeholder consultation during performance plan preparation must be made legally binding, not merely advisory.*

- Simplify the performance plan drafting process and reduce the administrative burden, particularly for smaller ANSPs and States.
- Make stakeholder consultation during performance plan preparation legally binding, with documented response requirements — especially where staffing, rostering, fatigue, training throughput or sector capacity assumptions are concerned.
- Ensure adequate recognition of long-term benefits in investment decisions. ATM infrastructure is long-lived and must be assessed on long-term value, not discounted within the reference period.
- Discontinue reliance on PRB guidance as the primary vehicle for legal interpretation. Where legal uncertainty arises, the EC should establish expert working groups with balanced representation — including operational staff.
- Adopt a formal review mechanism allowing performance plan revisions within 3–6 months of major operational change, as demonstrated necessary by the COVID experience.

4 Conclusions and Call to Action

RP5 presents European decision-makers with a fundamental strategic choice: should Europe pursue an ATM system optimised primarily for short-term cost minimisation, or one designed to remain safe, resilient, and effective in the face of unforeseen challenges?

Recent crises have demonstrated that resilience is not achieved without investment. It requires strategic workforce planning, adequate staffing levels, sufficient capacity reserves, and sustained investment in infrastructure and capability development. While these measures may increase costs in the short term, their medium- and long-term cost is considerably lower than the economic and operational consequences of chronic delays, capacity shortages, network disruption, and reactive crisis-recovery measures.

> *"The key question for RP5 is therefore not whether Europe can afford to invest in resilience, but whether it can afford not to."*

A performance framework that prioritises short-term cost efficiency at the expense of long-term capability risks undermining the robustness of the ATM system and increasing its vulnerability to future shocks. Europe must decide whether to invest proactively in a resilient and sustainable ATM system or continue operating with minimal reserves and incur significantly greater costs when the system inevitably comes under pressure.

IFATCA's engagement in the RP5 consultation reflects our conviction that this is a decisive regulatory moment. The performance scheme has been in place for over a decade. The evidence of its effects is now substantial, and the direction of those effects in the cost-efficiency and capacity domains is unambiguous: the scheme has penalised exactly the investments needed to build a resilient, high-capacity European ATM system.

RP5 is the opportunity to correct this. The Ramboll study is the right vehicle for a rigorous, evidence-based assessment of alternatives — and IFATCA commits to participating constructively in all phases of that study.

European aviation's competitiveness depends on a safe, efficient, and resilient ATM system. A safe, efficient, and resilient ATM system depends on a motivated, adequately staffed, and properly supported ATCO workforce. Any performance scheme that treats workforce sustainability as secondary to cost efficiency is building on sand — and the ATCO shortage crisis of the past five years is the proof.

IFATCA urges DG MOVE to:

- Engage directly with the active RP4 crisis before it becomes structural — the cost-efficiency benchmarking currently penalising capacity investment must be corrected now, not only in RP5.
- Design the RP5 scheme around outcomes, not proxies — replace the KEA proxy with genuine trajectory efficiency measures, replace the DUC with a framework that distinguishes between efficiency and investment, and replace the ATCO staffing metric with actionable workforce leading indicators.

- Treat workforce sustainability as a prerequisite condition for all performance, not as one variable among many.
- Coordinate the RP5 scheme design with the NFIR transposition and the EU Aviation Strategy — the three regulatory workstreams must be coherent with each other to produce coherent outcomes.
- Adopt a clear, binding timeline for RP5 implementation, with the implementing regulation final by end-2027.

Contact: *IFATCA EVP Europe, Benjamin Fichtner — submission email: benjamin.fichtner@ifatca.org*