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Dear Matt,

The ATC Branch IMPACT represents approximately 95% of ATCOs working for the Irish Aviation Authority. It welcomes this opportunity to respond to the Draft UK-Ireland RP2 performance plan consultation document.

The Branch welcomes the optimistic view expressed in the Draft document with regard to increases in traffic and is proud of its members' efforts and involvement in creating an efficient, lean IAA.

Three main issues arise for this Branch.

- 1. Just Culture There has been no agreement between the ATC Branch and the IAA about Just Culture policy. If the IAA continues to perpetuate the myth that it has such a policy and if it continues with an unagreed plan to train ATCOs, this Branch will have no option but to instruct its members not to comply with this training programme.
- 2. CAPEX In December 2013, Mr Eamonn Brennan, CEO IAA, made a series of presentations to the staff of the Authority. In these presentations, he outlined capital spend for the period 2014 -2018. For a new contingency centre based near the current

Shannon ACC, $\leq 5m$ was allocated. The figure in the Draft is $\leq 13m - a \ 160\%$ increase. The Branch disputes the need for such an increase in investment given that the use of any new facility is purely for contingency.

At the presentation to stakeholders on March 14th, it was stated that there was no plan to build a new Tower at Dublin airport. At the December presentations to staff, the CEO announced a €50m investment in this project and that it was due to commence in Q4 2014. One can only imagine that this Draft was well in development by mid-December, along with financial planning for RP2. It is hard to correlate two such extreme standpoints from the one organisation.

The Branch also takes issue with the statement to attendees at the stakeholders' meeting in London that the Irish Commission for Aviation Regulation may no longer have a role in determining terminal charges for Irish airports. As far as we are aware, the Commission has already invited submissions from interested parties before it determines the terminal charge applicable for the next reference period beginning in January 2016.

3. Savings: The ATC Branch takes the standpoint that a portion of any savings/financial benefit accruing to IAA as a result of the introduction of common amendments to Transition Altitude should be passed onto the staff.

Yours faithfully,

Helen Sheridan General Secretary, ATC Branch IMPACT