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Dear Colleagues,

First of all, I would like to thank you for the opportunity to provide feedback on the draft of the ATM Master Plan and draft performance indicators introduced on last SSC88 meeting.

We are delighted to take advantage of this opportunity, as the foreseen ATM Master Plan is very ambitious. Moreover, both the implementation of the ATM Master Plan and the use of the indicators will have significant impacts on a small Member State like Estonia. We have already expressed our position previously, but we find it essential to emphasize the following:

* Considering the future-orientation and long-term impacts of the ATM Master Plan, we find it important to have a mechanism on place and readiness to change it as the situation requires. The past years have been rather unstable and have significantly affected European air traffic (Covid-19 pandemic, Ukrainian war), so we must be prepared to adapt to different situations. The recent GNSS disruptions are a good example of how the environment and situation can change significantly from what was planned and with the need to make rapid changes to infrastructure capacity in cooperation with all stakeholders.
* Moreover, we find it utmost important to ensure that all parties involved take responsibility for the implementation of the ATM Master Plan. This is also crucial in the context that if enforcement measures need to be applied, as these measures should be directed at the parties who are actually hindering the ATM Master Plan success or not adhering to the agreements.
* The introduction of different risk-based indicators might lead to additional costs in creating additional positions, but the added value of different new roles on the example of Estonia is rather questionable.
* From a cost perspective activities that do not require additional costs to measure (investments, additional manpower) are certainly justified. However, it should be stressed that currently we are short of flights, but investment is needed to keep the system up and running and to develop it further. Our en-route cost level is increasing and additional investments put a lot of pressure to the airspace users and therefore the cost increase should be planned for when flights in Estonian airspace resume.
* It should be further analysed additions to the incentive scheme after the measures are tested and linked to the indicators.
* Regarding performance indicators and targets, we also consider it important that all involved parties take responsibility for their commitment. For instance, in the case of the environmental indicators – the ANSP is responsible for non-compliances and is penalized, although the actual choice of routes or trajectories is made by the air carrier.

Best regards,

Eve Härm

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Estonian Transport Administration