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**GLOBAL HARMONIZATION OF FLIGHT PLANNING: MITIGATING OPERATIONAL RISK
PENDING THE ‘SUNSET’ OF THE ICAO 2012 FLIGHT PLAN**

(Presented by the International Federation of Airline Dispatchers Associations)

EXECUTIVE SUMMARY

The impending transition from the ICAO 2012 Flight Plan format to modern data exchange protocols creates significant operational risks if not managed through globally harmonized procedures and training. This paper advocates for standardized implementation frameworks, enhanced dispatcher competency requirements, and robust human-machine interface protocols to ensure safety and interoperability during aviation’s digital transition.

Background

- a) The centrality of ICAO provisions for flight planning standardization naturally urges States to refrain from unilateral implementation of regional standards that risk global interoperability and operational safety.
- b) Member States may align national and regional implementation timelines with the established ICAO flight and flow information for a collaborative environment (FF-ICE) roadmap and provisions and the coordinated ‘sunsetting’ of the ICAO 2012 Flight Plan.
- c) The principles exist for system-wide readiness, whereby the applicability of new flight planning standards should be contingent upon verified operational capability by all relevant air traffic management (ATM) stakeholders.
- d) The International Federation of Airline Dispatchers Associations (IFALDA) is available to support any ICAO-led task force comprising States, air navigation services providers (ANSPs), operators, and flight dispatchers to develop mitigation measures for safety risks arising from concurrent use of multiple flight planning formats.
- e) The Principle of a Single Flight Plan exists: We recognize the operational and safety implications of mandating dual filing systems and will continue to work towards solutions that promote a single, global flight plan filing.

Strategic Objectives:

This working paper relates to *Every Flight is Safe and Secure* and *No Country is Left Behind*.

<i>Financial implications:</i>	The activities referred to in this paper are expected to be undertaken with the resources available in the 2026-2028 Regular Budget and/or from extra-budgetary contributions as guided by the ICAO Business Plan 2026-2028.
<i>References:</i>	Annex 1 — <i>Personnel Licensing</i> Annex 6 – <i>Operation of Aircraft, Part I – International Commercial Air Transport – Aeroplanes</i> Annex 19 – <i>Safety Management</i> Doc 10106, <i>Manual on Flight Operations Officers/Flight Dispatchers Competency-based Training and Assessment</i> Doc 9976, <i>Flight Planning and Fuel Management (FPFM) Manual</i> Doc 4444, PANS-ATM

1. INTRODUCTION

1.1 The International Federation of Air Line Dispatchers Associations (IFALDA) presents this information paper on behalf of the global Flight Dispatch and Flight Operations Officer profession, the licensed personnel responsible for the safety, legality, and operational control of flight plans.

1.2 This information paper addresses critical safety, economic, and operational concerns arising from the unilateral implementation of electronic flight planning (eFPL) standards by the European Union, which establishes a concerning precedent for global fragmentation. It highlights a fundamental lack of synchronization in the transition from the legacy ICAO 2012 Flight Plan (FPL) to a future eFPL system under the ICAO flight and flow information for a collaborative environment (FF-ICE) concept. From the Flight Dispatcher’s perspective, a flight plan embodies a seamless four-dimensional trajectory (4DT) for a single flight. It is imperative that this integrity remains undisturbed by regional disparities in filing formats and monitoring requirements, which introduce ground-based fragmentation into what is, by nature of flight safety and efficiency, a seamless, continuous global operation.

1.3 The European Union’s mandate for FF-ICE Release 1 implementation by 31 December 2025 serves as the primary catalyst for this concern. While introduced with the aim of modernizing air traffic management within the region, this initiative inadvertently imposes a fragmented operational framework on global operators a full decade ahead of the planned global transition. It is essential to note that ICAO is actively developing a comprehensive FF-ICE framework beyond the current R1 specifications, with the global "sunset" of the legacy ICAO 2012 Flight Plan scheduled for 2035. This misalignment forces a single flight to be managed under two separate planning and filing paradigms—one for European Union (EU) airspace and another for the rest of the world—directly contravening the operational continuity and harmonization that underpin global aviation safety and efficiency. This situation not only places an undue burden on air operators but also challenges the spirit of worldwide interoperability and coordinated modernization that ICAO fosters, creating costly duplication of effort and potentially necessitating a second major system overhaul when global standards take effect.

2. DISCUSSION

2.1 The global aviation community, under ICAO's leadership, is collaboratively progressing towards the FF-ICE concept as outlined in the *Global Air Navigation Plan (GANP, Doc 9750)* and the Roadmap with a projected coordinated sunset of the legacy ICAO 2012 Flight Plan format around 2035.

This timeline allows for the development of robust global SARPs and synchronized investment by States and industry. In contradiction to this coordinated approach, the EU will unilaterally mandate FF-ICE Release - R1 in 2025. This requires all instrument flight rules (IFR) flights within its jurisdiction to be filed via a machine-to-machine XML interface, fundamentally altering the flight planning ecosystem a decade early.

2.2 The core operational challenge is the creation of a mandatory dual-filing obligation. For a single flight (e.g., Paris to Singapore), the Flight Dispatcher must file:

- a) an FF-ICE R1 eFPL (XML) for the EU portion of the flight; and
- b) a legacy ICAO 2012 FPL (ATS message) for the non-EU portion of the flight for the downstream FIRs and the destination.

2.3 This is not a simple format change; it requires maintaining two separate, parallel operational processes for the same aircraft movement, doubling the complexity, workload, and risk of critical error for the flight dispatcher.

2.4 Moreover, the EU's FF-ICE R1 is architecturally designed as a system-to-system (B2B) interface. To facilitate human interaction, the mandate requires airlines to use a dedicated ePORTAL for real-time monitoring and tactical re-filing.

2.5 However, the reality for the vast majority of operators-both within and outside Europe-by the deadline will be starkly different. Most lack the resources to develop direct B2B interfaces and will be entirely reliant on third-party Flight Planning Service Providers (FPSPs e.g., Lido, Jeppesen, Sabre) to generate and submit the XML eFPL on their behalf. This creates a critical disconnect: the Dispatcher retains legal responsibility but is isolated from the real-time digital dialogue, relying on secondary feedback from their FPSP rather than direct data from the Network Manager. This fragmentation degrades situational awareness-a key component of the safety net.

2.6 This significant burden on operators is seemingly undertaken for no immediate operational benefit. The promised efficiencies of trajectory-based operations (TBO) depend on air navigation services providers (ANSPs) having the capability to process and utilize the enhanced data. Yet, a significant number of European ANSPs, including major Airports and ACC's, have confirmed they will not be fully ready by the mandate deadline, certainly not before 2030. Operators are thus forced to generate data that cannot be effectively used, purely for mandate compliance.

2.7 This early regional implementation creates an inherent inefficiency. The ICAO Global SARPs, due circa 2035, are likely to differ significantly from the EU's R1. Airlines and States are therefore being forced to invest "millions" in a system that may be obsolete within a decade, requiring another costly overhaul. European ANSPs investing in R1-compliant systems face the same quandary, and these costs will inevitably be passed through to operators via higher ANS charges. This represents a wasteful use of global industry capital and creates a future of disruptive transitions rather than a single, coordinated global change.

2.8 A fundamental flaw in the current implementation model is its disproportionate application of obligations. The mandate, enforced by the Network Manager, places the entire onus of compliance and the burden of proof on air operators, who face significant EU penalties for non-compliance. Conversely, there exists no parallel, enforceable mandate or accountability mechanism for

States, Airports, and ANSPs to achieve and demonstrate readiness to receive, process, and utilize the eFPL data. This creates an asymmetrical and inequitable environment where operators are required to invest in and utilize a new system to generate data for infrastructure that is not obligated to be ready to receive it, fundamentally undermining the collaborative principle of system-wide implementation.

3. CONCLUSION

3.1 The flight dispatcher/flight operations officer, as the licensed final authority for flight plan integrity and operational control, faces an impossible mandate. Requiring this role to maintain two parallel, technically and procedurally disparate filing systems for a single aircraft movement represents a fundamental and direct contradiction of the core aviation principles of safety and efficiency. It deliberately fractures the Dispatcher's situational awareness and command of the flight's data, introducing an unacceptable and systemic risk into the global aviation system.

3.2 This is not merely an operational inconvenience but a direct and significant degradation of safety. The inherent risk of confusion, mis-filing, or data inconsistency between the two parallel processes for a single flight creates clear and present dangers, including the potential for erroneous data on air traffic control (ATC) screens and a loss of shared situational awareness between the cockpit and ground control and delays on the ground awaiting start-up.

3.3 Therefore, the EU's FF-ICE R1 mandate, though well-intentioned, must be recognized as a concerning precedent for global fragmentation. It prioritizes regional timelines over global harmony and operational safety. It forces a costly, burdensome, and risky dual-system paradigm onto operators with no operational benefit in the near term, as key ANSPs remain unready to utilize the new data.

3.4 Ultimately, this approach introduces significant operational risk while lacking economic efficiency. By deviating from the coordinated ICAO timeline, it forces the global industry to invest "millions" in a system that risks obsolescence upon the implementation of the true global ICAO standard circa 2035, ensuring further disruption and wasteful expenditure for all stakeholders. IFALDA concludes that this approach undermines the very collaboration and harmonization that ICAO was established to uphold.

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