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The International Federation of Air Line Pilots' Associations



IFALPA
The Global Voice of Pilots

11 September 2014

To: ICAO Afghanistan Airspace Special Coordination Group

Dear Sir or Madam:

My apologies for being unable to attend the Special Coordination Meeting following APANPIRG on September 11 – 12, as a scheduling conflict requires my attention in Hong Kong. The importance of this issue, as highlighted by our discussions at ATM/SG/2 in Hong Kong last month, warrants comment from the International Federation of Air Line Pilots' Associations (IFALPA).

It is the position of IFALPA that flights in Afghanistan airspace, as with other regions experiencing conflict, should only be conducted following an analysis of the safety and security of the entire flight information region (FIR), including ground facilities to support an emergency diversion. The analysis of air traffic services and supporting infrastructure must ensure capabilities are maintained and, where applicable, capacity constraints are in place to sustain system safety. Moreover, the residual risk of ground or air attack shall be sustained at a level as low as reasonably practical (in line with ALARP principles). Most importantly, assessments should be based on credible, real-time, actionable intelligence obtained from an unbiased agency with the tools and experience to reach a reasonable conclusion.

Based on recent information provided by ICAO, IFALPA believes it is prudent to establish contingency procedures for the closure of Afghan airspace, should it become necessary. While IFALPA acknowledges a closure of Afghanistan airspace could have a negative impact on airlines' cost structures, it would be an unacceptable risk to base decisions to operate in any airspace solely on cost.

Sincerely,

Captain Brian Legge
IFALPA Regional Vice President – North Pacific

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