



Mr. Graeme Dey  
Minister for Transport  
The Scottish Government  
St. Andrew's House, Regent Road  
Edinburgh, EH1 3DG  
Scotland

Dear Minister Dey,

I write to you today on behalf of the European Transport Workers' Federation (ETF) who represent 5 million transport workers in 41 countries across Europe, including in the UK. We are the largest organization representing aviation workers in Europe, including those in the ATM sector.

We wish to highlight our concern with recent reports from HIAL airports, that the company intends to close ATC towers in six airports and centralise their operation through a remote tower centre. It is our view that such a move would deplete much needed highly skilled jobs from local communities and open up considerable risk to these communities, particularly for the operation of essential services such as medical flights.

Scotland is not the first nation to implement remote towers in remote communities, but all instances required considerable time, study and assessment of the socio-economic factors attached to such decisions. Without close inspection, it is clear to us that removing such in-person services will greatly affect the livelihoods of such communities in which the airport plays a key role. Airports provide significant indirect employment in local communities, and the same can be said for ATC towers. This includes indirect jobs providing maintenance and services to the tower, from engineering to cleaning, all will be affected by this decision.

As I am sure you are aware, remote tower technology remains in its infancy. In the UK, there is only one tower now operated remotely, and that is in London City airport, located in the middle of one of the largest cities in Europe. It is operated from one of the largest ATM operations centres in Europe in Swanwick, and all the infrastructure associated with both the location of the airport, and the controllers, provides a certain level of institutional support. Unlike in London, most HIAL airports require constant access to aviation for medical, and other emergency purposes. There is no plan b in these locations, and for that, ATC services must be assured. Given the infancy of the technology, we find it difficult to assure these communities that that service can be provided in the event of bad weather, infrastructural damage or cyberattack.

Similarly, the downgrading of services at Benbecula and Wick comes with safety concerns. Our understanding is that these airports will be downgraded from an air traffic control service to an aerodrome flight information service. This type of reduction simply removes the ability to issue instructions to arriving and departing aircraft. This runs significant risks, particularly when weather or visibility is an issue, or if there is an increase in traffic. The provision of aerodrome flight information service is common and, in most cases, suitable for general aviation or hobby flying, but given the nature of the operations in both Benbecula and Wick (scheduled air services, ferry flights, and offshore helicopter operations), it would not be suitable to downgrade services at the airports on the basis of safety, given the nature of both the airports, and the traffic they serve.

Given these concerns, it is essential that the Scottish government intervene and understand the consequences of this decision for its citizens, workers and broader society in the Highlands & Islands. While these decisions may seem like a cost exercise on paper, such decisions have a direct impact on the livelihoods of individuals and the communities in which they live in. In our view, the safety and development of these communities should be prioritized over all other concerns, including cost efficiency and profit. Unlike most of the world, such communities rely on aviation for basic services, and to deprive them of a reliable service could have dire consequences.

Yours Sincerely,



Livia Spera  
Acting General Secretary