

Heathrow Winter Resilience Enquiry

The opportunity is welcomed by BAR UK and the LHR AOC to appear as witnesses at this enquiry, for which this document is an advance written submission.

1. Introduction

1.1 The Heathrow Airline Operators' Committee (LHR AOC) represents all the airlines that operate at Heathrow airport, and is the organisation that liaises with BAA on service provision and operational matters.

1.2 The Board of Airline Representatives in the UK (BAR UK) Ltd is the airline association that represents 86 airlines in its dealings with government and a range of other organisations, including airports, on matters of common cause. The great majority of airlines that operate to Heathrow are also members of BAR UK. Further details at www.bar-uk.org.

1.3 LHR AOC and BAR UK liaise with each other on a number of issues, not least the topic of this enquiry. We believe the enquiry board will gain by our joint appearance as witnesses.

1.4 Our written submission now follows, guided by the Terms of Reference.

It is aimed at:

- providing feedback on the handling the snow event itself
- demonstrating the adverse impacts suffered as a result of the handling of that event, which are measurements of what went awry
- suggesting some ways forward for handling future crisis events.

2.Executive Summary

2.1 A very heavy snowfall on one day resulted in a 5 day crisis event. That was an unacceptable outcome for the airports customers and their passengers.

2.2 There is an apparent lack of working knowledge, by airlines, of the snow plan itself, and BAA's crisis management plans.

2.3 An outdated and inconsistent crisis management process is employed.

2.4 There was a lack of skilled BAA management to handle the crisis.

2.5 There were inadequate resources, either in the form of limited supplies of de-icing media, or in the employment of outside staff resources.

2.6 There is an inconsistent communications process in respect of the airline community and their passengers.

2.7 The Night Flights dispensation process is ill-suited for this type of event, and airport operators should be given full authority to issue dispensations themselves.

2.8 There is no accepted recognition that the airport's customers, the airlines, suffered great financial losses as a result, and that a compensation/alleviation process should be established.

3. The impact of the airport closure and subsequent restrictions

3.1 The value of this enquiry will be much enhanced by understanding the impacts of the disrupted performance in December, not just for passengers and stakeholders within the airport perimeter, but also for those around the world.

3.2 Tens of thousands of passengers were stranded at all four terminals, many of whom were in transit.

3.3 Tens of thousands more were stuck, either en route, or at departing airports, all over the world.

3.4 Freight was similarly affected. Impacts would have been felt by all freight operators, customers, not least those involved with livestock, perishable goods and 'just in time' consignments..

3.5 Aircraft en route to a closed Heathrow were stuck in various parts of Europe and the near east, having been diverted there.

3.6 Those aircraft were then denied for use elsewhere, either for UK-based carriers operating from Heathrow, or for foreign-based carriers at their bases. Either way, passengers and networks around the world were very adversely affected as a result of the disruption at Heathrow.

3.7 It is also reported that sixteen flights were ready to depart on December 18th but were denied the opportunity. This was punitive to the airlines and the passengers involved, and denied vital additional stand space that was at such a premium.

3.8 Heathrow's closure, and subsequent heavily-curtailed operational capacity, imposed liabilities on airlines through the application of Regulation EU261/2004 (Denied Boarding Regulation). Without any limitation of time, or with any reference to the cost of the fare, airlines have a duty of either care and assistance, rerouting or refunds. Simultaneously, they lost revenues and incurred great costs as a result of this disrupted operation.

3.9 Reputations suffered through the handling of this event. The reputation of the country suffered, those of the airlines suffered and so did that of BAA.

4. Heathrow's Snow Plan and its execution

4.1 It is unclear as to how knowledgeable airlines and ground-handlers were about the snow plan, or whether copies were lodged with them. Whilst the airline community might have been exposed to the snow plan, and its criteria, they would have been guided by the airport operator to its effectiveness.

4.2 Such guidance would have included past weather records in general, and previous weather events at Heathrow.

4.3 Airlines' expertise lies in running airlines and effectively operating contingency plans in time of crisis. The expertise of the airport would be expected to lie in running airports, and managing the contingency in events, such as snowfalls, that affect their operations.

4.4 The airline community has been shouldered by BAA with the some of the blame for the inadequacy of the snow plan, as they had supposedly accepted it. That blame is firmly rejected.

4.5 The baseline is that the airline community are customers of the airport, and provision of airport and airfield services lie firmly with the airport operator.

4.6 Inconsistencies appear to exist in respect of:

- a) protocols as to which terminals were to be de-iced first
- b) which taxiways should be de-iced and to what criteria e.g. full width or for safe operations at reduced width
- c) whether or not airlines and/or their own contractors could be used to clear stands
- d) whether or not BAA could request the assistance of HM services and/or construction site staff who were present.

4.7 Sufficiency of de-icing media

4.7.1 It is suggested that the statement that the airport never exhausted runway/taxiway de-icing media be explored by this Enquiry.

4.7.2 It is widely understood that the southern runway remained closed for so long because, towards the end of the 'event', available supplies were so limited that the choice was either keeping the northern runway open for two days, or opening both runways for one day, after which time no media would exist.

4.8 Passenger care

4.8.1 Feedback strongly suggests that the operational situation was so mis-read that the supply of marquees at terminals was a very late event, and significantly contributed to the unacceptable passenger care issues that became so evident.

4.8.2 One such example is the intended closure of Terminal 1 on the evening of 18 December. Despite the snow still falling, and the freezing temperatures, BAA intended to empty the terminal of passengers, who had nowhere else to shelter, and lock them out of the terminal. Such a measure was completely unacceptable in concept, let alone operation, and should never have been countenanced. It is understood that airline managers on the spot managed to get common sense to prevail, otherwise a public disorder event was very probable.

5. Execution of crisis management plan

5.1 It is suggested that the Enquiry explore if the plan was shared with the wider airline community. It is not at clear that it was, how it worked when implemented, and what the command structure was.

5.2 The feedback received strongly suggests that there was not enough senior management available during the crisis. The quality and training of some staff, and their ability to manage the situation has been questioned.

5.3 Communication between BAA and airlines was of an inconsistent nature. Problems were experienced in the clarity of decisions that had been made, and even telephone numbers should be used to contact various members of the crisis team.

5.4 It is contended that the crisis management process itself is inconsistent, outdated, and does not utilise technology in a way that could be beneficial to all parties. It's inconsistent in respect of the AOC. For previous events, the AOC has been positioned alongside BAA at their crisis centre; that did not happen for this major crisis.

5.4.1 Acknowledging that inconsistency, the crisis management liaison with external stakeholders appears to rely on either meetings or e mails; nothing wrong in that by itself but very limiting in effectiveness.

5.4.2 Such a system relies on those stakeholders being free to cascade that information to their own staff, ground-handlers and other stakeholders. If they are not free to do so, because they are caught up handling other issues arising from the crisis, then delays occur.

5.4.3 Based on effective and welcome experience with them, it is suggested that the Enquiry investigate the crisis process implemented by NATS. This uses a dedicated crisis website available 24/7 to all authorised users.

5.4.4 Information that has been promulgated by other means e.g. meetings , e mails etc. is published on the website. It is clear in its messages, and instantly available to all stakeholders, wherever in the world they may be. It also includes NOTAMS and other operating instructions.

5.4.5 The aspect of access on a worldwide basis is essential to understand. Such stakeholders include airline head offices and flight operations departments of airlines who were unclear whether or not Heathrow would be open on arrival from overseas. A reliance on forwarded emails reaching them in time is an outdated and unreliable methodology.

5.4.6 Another crucial element employed by NATS during the volcanic crisis, another long term event that invites comparison, was the establishment of an airline/airport liaison unit directly next door to the crisis centre at Swanwick. It played a valuable role in determining requirements and priorities for the time when airspace became available. BAR UK was located there for the duration that it operated.

6. Heathrow recovery in restoring the operation

6.1 The feedback provided here flows naturally from the above evidence relating to the execution of the crisis plan.

6.2 It was certainly unclear what runways would reopen, and when.

6.3 The continued closure of the southern runway was unexpected and denied the airport 50% of its operating capacity. It required capacity reductions by all carriers when the need for additional capacity was at its greatest.

6.4 Whilst the slot reduction decisions were communicated, they weren't always timely or, indeed, fully comprehended in practical terms.

6.5 For example, a 30% reduction in flights translate very differently for low-frequency operators e.g. do four flights a day have to be reduced by one flight (a 25% reduction) or by two flights (a 50% reduction)? The smaller the frequency, the bigger the questions raised.

6.6 If a protocol already exists, then it needs to be re-published. If it doesn't, then it is suggested that such a protocol be discussed and agreed with the airline community.

6.7 Wider communications to airlines and passengers were woolly, such as 'the airport is closed until further notice'; that's a phrase that says everything and nothing, and against which plans cannot be formulated.

6.8 As a result, the needs of passengers and airlines were not met over a number of days.

6.9 As referred to in Paragraph 4.6 (d) above, resources certainly seemed to have been wasted by not employing construction staff, and their equipment, who were on site. Media reports also suggest that the idea of asking for assistance from H.M. Services was turned down, another possible wasted resource.

6.10 There is nothing to suggest that a proactive approach was taken throughout the duration of this crisis.

6.11 The Night Flights dispensation process is ill-suited for this type of event.

- a. The recovery phase was limited by it.
- b. Under such circumstances, neither airlines nor airport operator should have to undergo the demonstration of need to the Dept for Transport, and then await their decision.
- c. We would support BAA, and any other operator in similar circumstances, having the authority to a) grant the dispensation, and b) permit dispensation for flights at anytime during the night.
- d. As an audit measure, the airport operator would then provide full details to the DfT of who operated, when, to where, and with what loads.
- e. Such flexibility would allow a much faster recovery period, provide aircraft stand capacity and permit more arrivals.

Conclusions

1. A very heavy snowfall on one day resulted in a 5-days crisis event. That was an unacceptable outcome for the airport's customers and their passengers.
2. An outmoded and unreliable crisis management system must be replaced with one that has clear and effective lines of communication, operated by experienced staff.