

Performance Review Board

Monitoring Report

Denmark - 2024



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1 OVERVIEW

1.1 Contextual information

National performance plan adopted following Commission Decision (EU) 2022/770 of 13 April 2022

List of ACCs 1
Copenhagen ACC

Exchange rate (1 EUR=)
2017: 7.43692 DKK
2024: 7.45701 DKK

Main ANSP
• NAVIAIR

No of airports in the scope of the performance plan:

- ≥80'K 1
- <80'K 0

Share of Union-wide:
• traffic (TSUs) 2024 1.2%
• en route costs 2024 1.7%

Other ANSPs
-

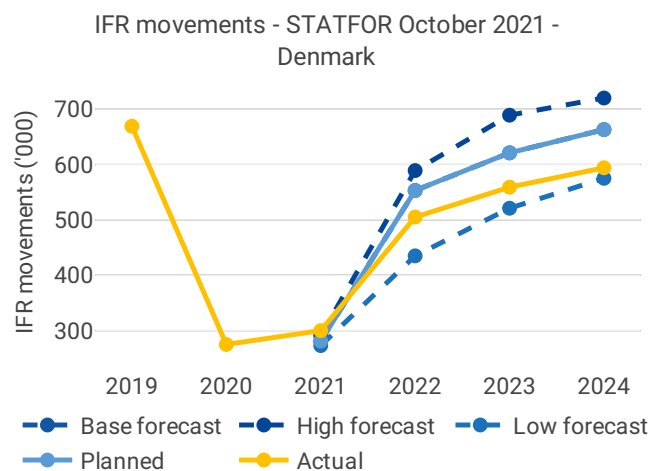
Share en route / terminal costs 2024 80% / 20%

MET Providers
• DMI

En route charging zone(s)
Denmark

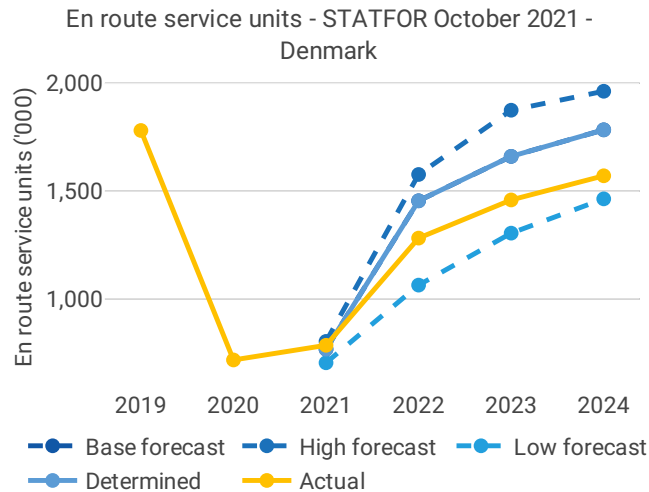
Terminal charging zone(s)
Denmark

1.2 Traffic (En route traffic zone)



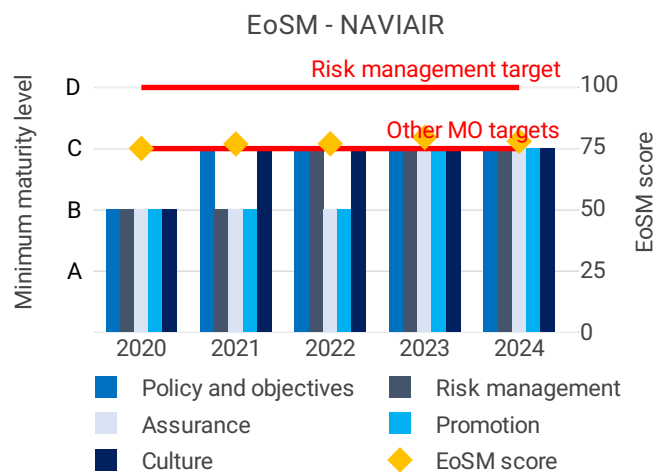
- Denmark recorded 594K actual IFR movements in 2024, +6.3% compared to 2023 (559K).
- Actual 2024 IFR movements were -10.4% below the plan (663K).
- Actual 2024 IFR movements represent 89% of the actual 2019 level (669K).





- Denmark recorded 1,571K actual service units in 2024, +7.7% compared to 2023 (1,459K).
- Actual 2024 service units were -11.9% above the plan (1,784K).
- Actual 2024 service units represent 88% of the actual 2019 level (1,781K).

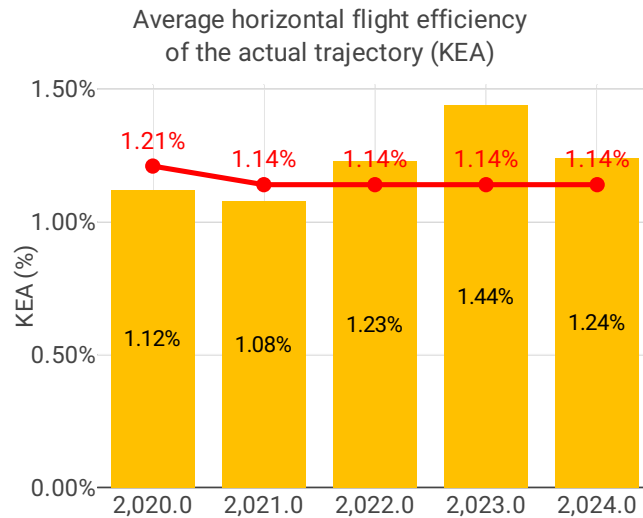
1.3 Safety (Main ANSP)



- NAVIAIR achieved four out of five Management Objectives targets, but lacked sufficient improvement in safety risk management causing NAVIAIR to miss the RP3 targets in 2024.
- Denmark did not record any runway incursions (RIs) in 2024 and has seen a very low rate since 2022. The rate of separation minima infringements (SMIs) increased but remained below the Union-wide average.
- Denmark should ensure that the ANSP implements, in a timely and cost-efficient manner, the necessary additional measures such as enhanced processes, improved allocation of resources, targeted training, and systematic reviews. Without such actions, the achievement of the RP4 targets could be jeopardised.

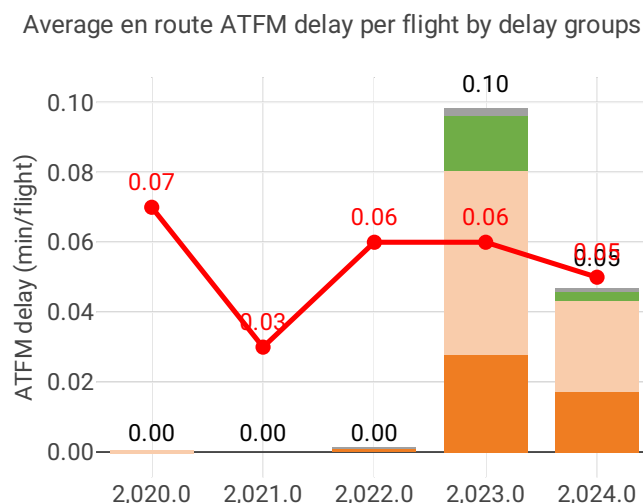


1.4 Environment (Member State)



- Denmark achieved a KEA performance of 1.24% compared to its target of 1.14% and did not contribute positively to achieving the Union-wide target.
- The NSA states that the main reason for NAVIAIR not achieving the target is the staffing challenges it faces.
- Both KEP and SCR improved in 2024. Despite the KEA target being missed, the improvement in SCR shows that Denmark has improved the environmental efficiency of its airspace when accounting for impacts outside of its control.
- The share of CDO flights increased from 48.64% to 50.26% in 2024.
- Additional taxi out time decreased marginally from 2.59 to 2.53 min/flight, while additional time in terminal airspace decreased from 1.10 to 0.96 min/flight, in 2024 compared to 2023.

1.5 Capacity (Member State)

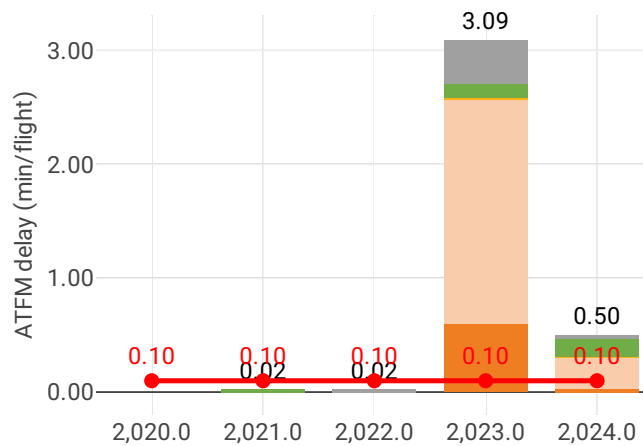


- Denmark registered 0.05 minutes of average en route ATFM delay per flight during 2024, which remained 0.05 after the post-ops adjustment process, thus achieving the local target value of 0.05. Delays in Denmark decreased by 0.05 minutes per flight year-on-year.



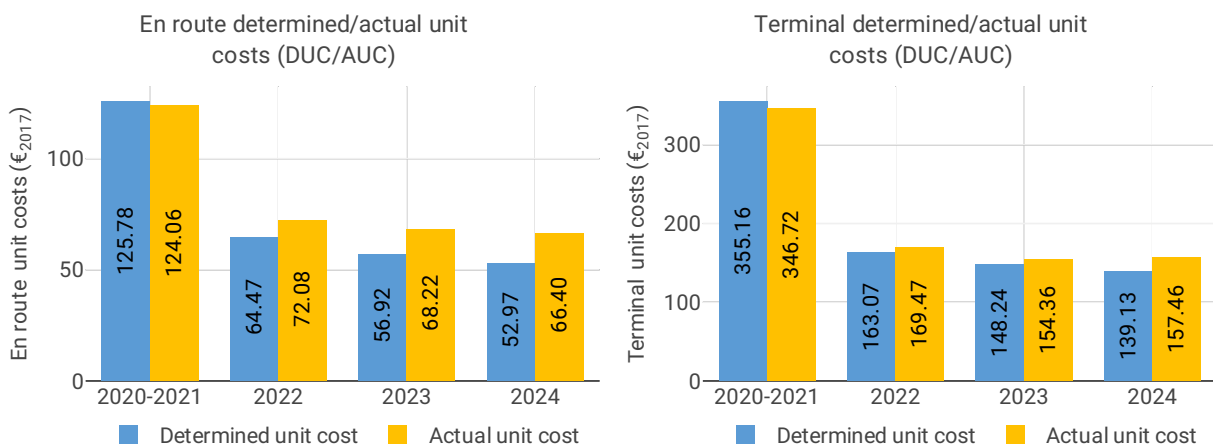
- Delays were highest in June, July and September, mostly due to ATC Capacity and Staffing issues.
- The share of delayed flights with delays longer than 15 minutes in Denmark increased by 2 percentage points compared to 2023 and was higher than 2019 values.
- The average number of IFR movements was 11% below 2019 levels in Denmark in 2024.
- The number of ATCOs in OPS is 101, being over the 2024 plan in Copenhagen by 2 FTEs.
- The yearly total of sector opening hours in Copenhagen ACC was 44,464, showing a 0.3% decrease compared to 2023. Sector opening hours are 0.5% below 2019 levels.
- Copenhagen ACC registered 11.62 IFR movements per one sector opening hour in 2024, being 10.0% below 2019 levels.

Average arrival ATFM delay per flight by delay groups



- Denmark registered an average airport arrival ATFM delay of 0.50 minutes per flight in 2024, thus not achieving the local target of 0.10 minutes.
- Compared to 2023, average arrival ATFM delays in Denmark were 84% lower in 2024, while the number of IFR arrivals increased by 6%.
- The main drivers of delays were ATC staffing, accounting for 56% of delays, and weather, responsible for 33%.

1.6 Cost-efficiency (En route/Terminal charging zone(s))



- The en route 2024 actual unit cost of Denmark was 66.40€2017, +25% higher than the determined unit cost (52.97€2017). The terminal 2024 actual unit cost was 157.46€2017, +13% higher than the determined unit cost (139.13€2017).
- The en route 2024 actual service units (1.6M) were -12% lower than the determined service units (1.8M), mainly due to shifted traffic flows caused by Russia's war of aggression against Ukraine.
- The en route 2024 actual total costs were +10M€2017 (+10%) higher than determined. This was mainly driven by higher staff costs for NAVIAIR (+8.8M€2017, or +19%). The NSA explains that this is due to wage increases resulting from a collective agreement for all government employees, the execution of an agreement with the ATCO union, as well as a high level of extra shifts. The NSA did not provide sufficient information on the reason for these additional shifts, which contrasts with the significant reduction in service units compared to the plan.
- NAVIAIR costs of investments were 19M€2017 in 2024 for both en route and terminal charging zones, -7.0% less than determined (20M€2017). According to the NSA, this reduction is due to reduced depreciation resulting from "fewer and postponed investments, and later date of entry into operation than planned".
- The en route actual unit cost incurred by users in 2024 was 64.52€ (+16% above the 2024 DUC), while the terminal actual unit cost incurred by users was 162.15€ (+10% above the 2024 DUC).
- The en route regulatory result for NAVIAIR amounted to -11M€. The loss is mainly attributable to the application of the cost risk sharing mechanism, in particular the negative difference between determined and actual costs to be borne by the ANSP.

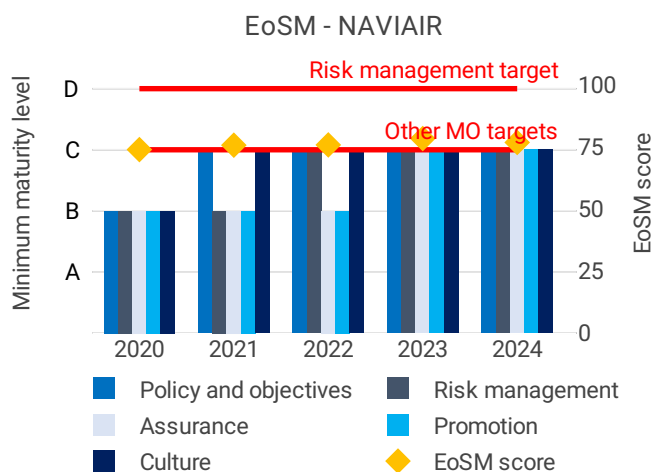


2 SAFETY - DENMARK

2.1 PRB monitoring

- NAVIAIR achieved four out of five Management Objectives targets, but lacked sufficient improvement in safety risk management causing NAVIAIR to miss the RP3 targets in 2024.
- Denmark did not record any runway incursions (RIs) in 2024 and has seen a very low rate since 2022. The rate of separation minima infringements (SMIs) increased but remained below the Union-wide average.
- Denmark should ensure that the ANSP implements, in a timely and cost-efficient manner, the necessary additional measures such as enhanced processes, improved allocation of resources, targeted training, and systematic reviews. Without such actions, the achievement of the RP4 targets could be jeopardised.

2.2 Effectiveness of Safety Management (EoSM) (KPI#1)



Focus on EoSM

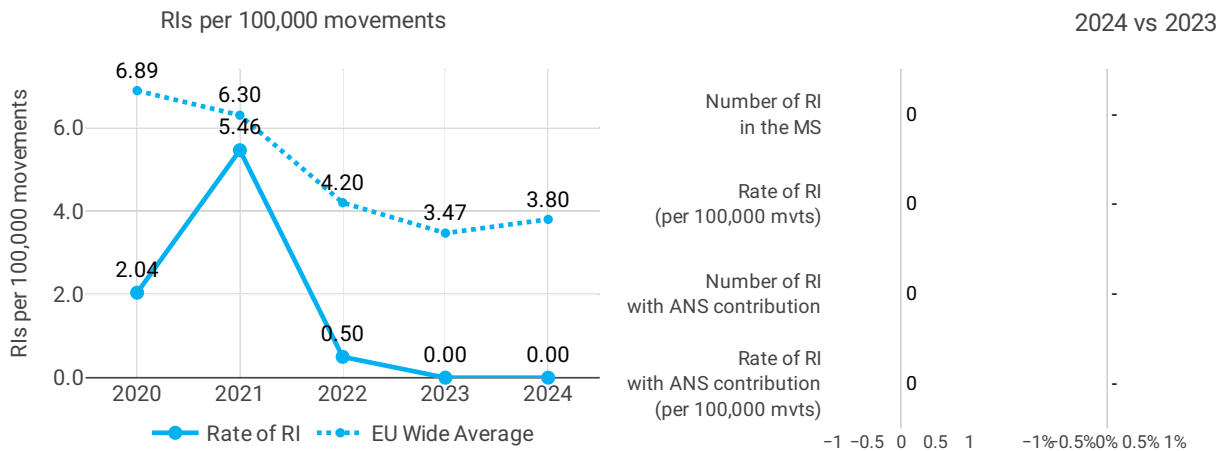
Four out of five EoSM components of the ANSP meet the RP3 EoSM target level. Only “Safety Risk Management” is below 2024 target level. Three questions are to be improved to reach the RP3 target level.

NAVIAIR has gradually improved the performance of the SMS over RP3 but did not manage to improve Safety Risk Management to reach maturity level D in 2024. One out of three areas in the Management Objective remained at level C.



2.3 Safety occurrences

2.3.1 Rate of runway incursions (RIs) (PI#1)



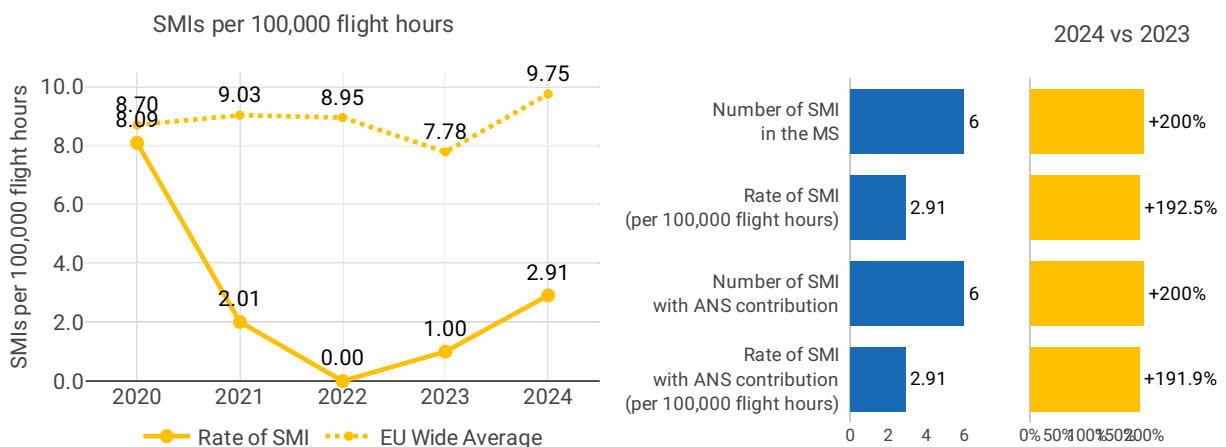
Rate of RIs per 100,000 airport movements - Denmark

#	Airport name	APT movements	Number of RI	Rate RI per 100,000
1	Copenhagen - Kastrup	240,676	0	0.00

Focus on runway incursions

After a peak in 2021, Denmark recorded a low number of occurrences RIs, with no occurrences in 2023 and 2024 despite the increasing number of movements. Denmark is significantly below the Union-wide average.

2.3.2 Rate of separation minima infringements (SMIs) (PI#2)



Rate of SMI with ANS contribution per 100,000 flight hours

#	ANSP	Flight hours					Number of SMIs				
		2020	2021	2022	2023	2024	2020	2021	2022	2023	2024
1	NAVAIR	98,936	99,279	183,043	200,904	206,447	0	2	0	2	6



#	ANSP	Rate of SMI per 100,000 flight hours					% variation in rate of SMIs				
		2020	2021	2022	2023	2024	2020	2021	2022	2023	2024
1	NAVIAIR	0	2	0	1	3	0%	-100%	0%	+192%	

Focus on separation minima

Denmark started RP3 with a high rate of SMIs but improved significantly between 2020 and 2021, remaining at a low level until 2023 despite a continuous increase in the number of flight hours. In 2024, Denmark recorded an increase in the number of separation minima infringements (SMIs) with ANS contribution while remaining well below the Union-wide average.

The NSA did not provide information regarding specific actions following the increase in SMIs.

2.3.3 Quality of occurrences reporting

n/a

2.4 Use of automated safety data recording system (ASDRS) (PI#3)

Use of automated safety data recording system - 2024	
For RIs	For SMIs
X	X



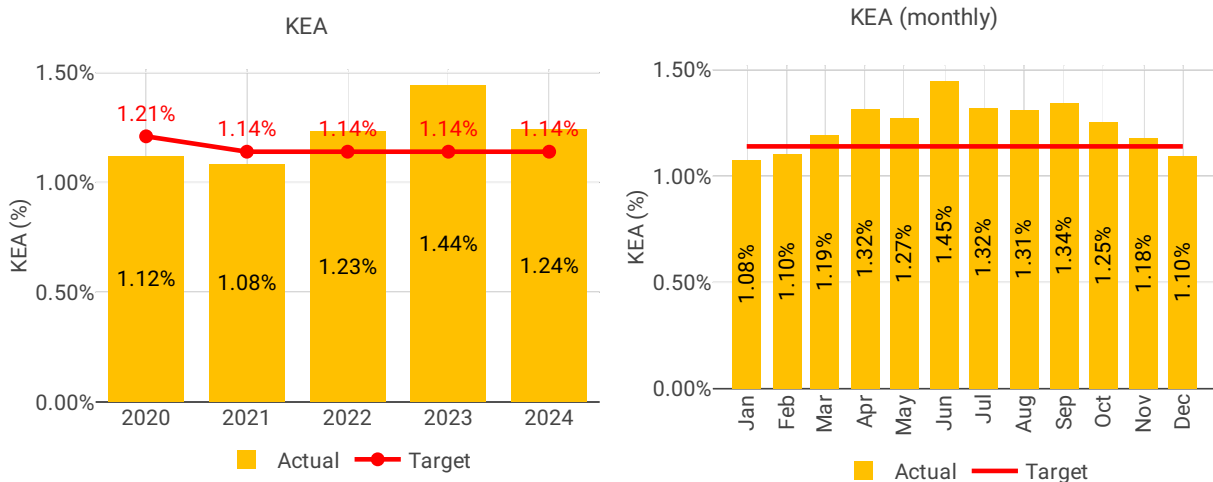
3 ENVIRONMENT - DENMARK

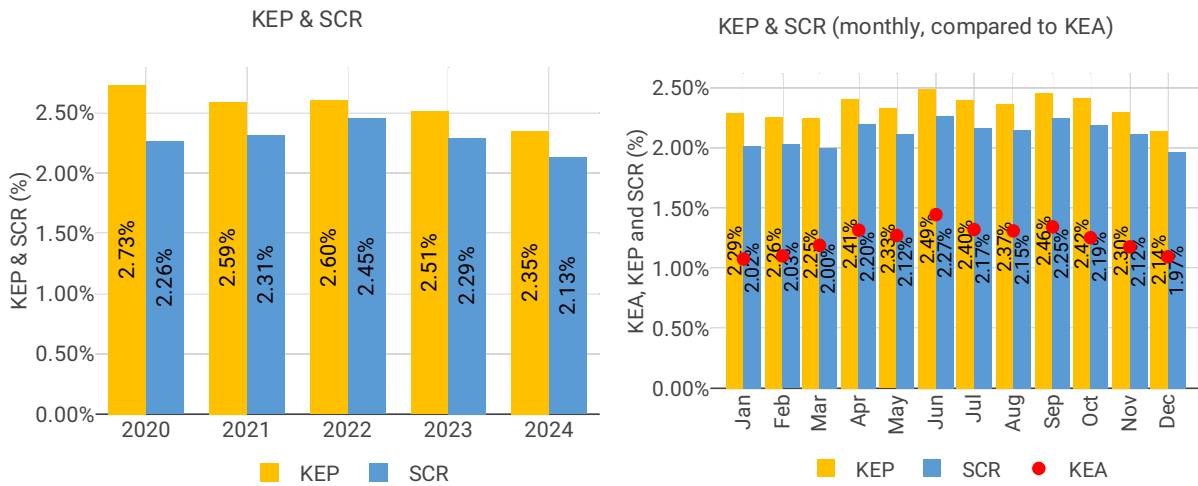
3.1 PRB monitoring

- Denmark achieved a KEA performance of 1.24% compared to its target of 1.14% and did not contribute positively to achieving the Union-wide target.
- The NSA states that the main reason for NAVIAIR not achieving the target is the staffing challenges it faces.
- Both KEP and SCR improved in 2024. Despite the KEA target being missed, the improvement in SCR shows that Denmark has improved the environmental efficiency of its airspace when accounting for impacts outside of its control.
- The share of CDO flights increased from 48.64% to 50.26% in 2024.
- Additional taxi out time decreased marginally from 2.59 to 2.53 min/flight, while additional time in terminal airspace decreased from 1.10 to 0.96 min/flight, in 2024 compared to 2023.

3.2 En route performance

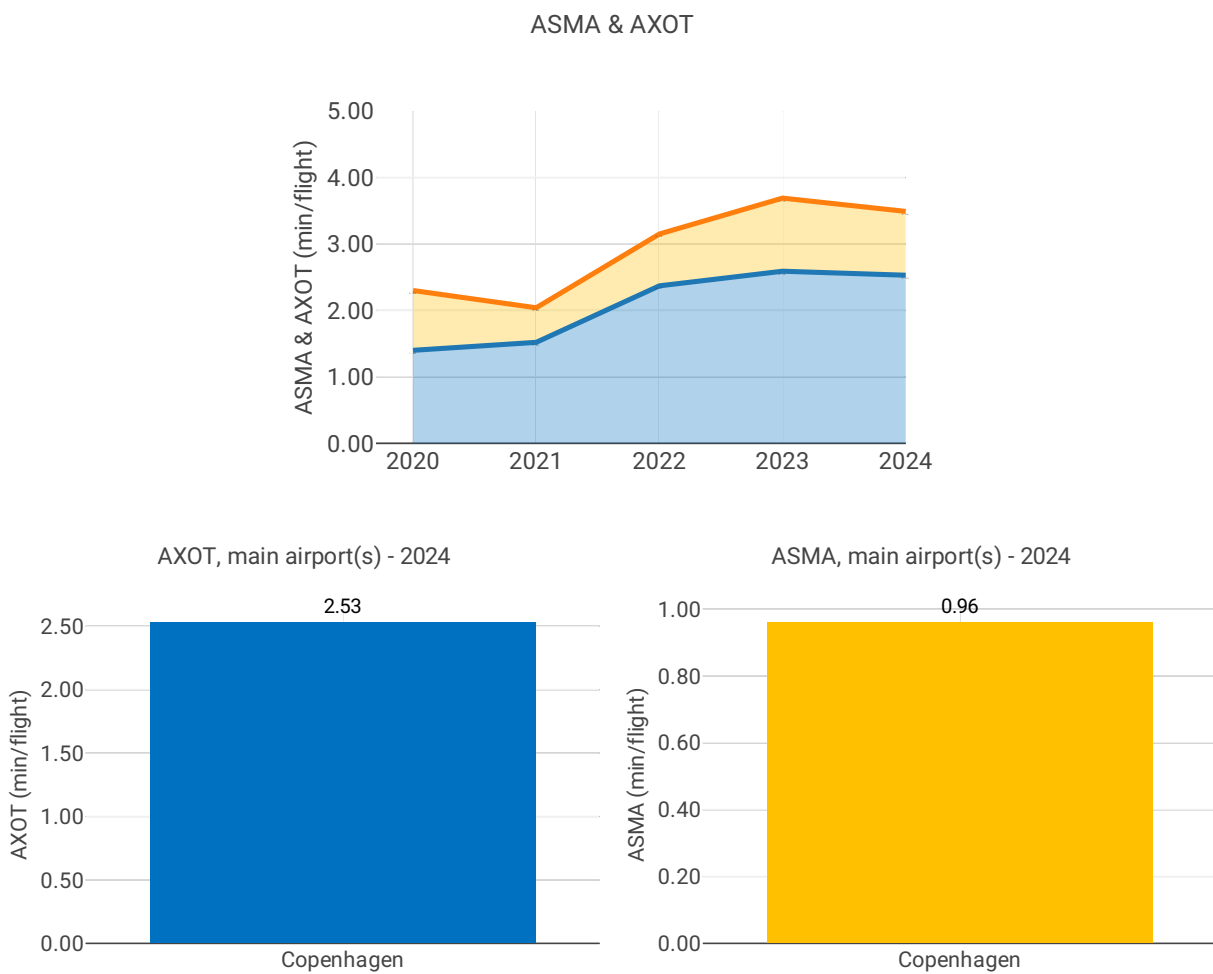
3.2.1 Horizontal flight efficiency of the actual trajectory (KEA) (KPI#1), of the last filed flight plan (KEP) (PI#1) & shortest constrained route (SCR) (PI#2)





3.3 Terminal performance

3.3.1 Additional taxi-out time (AXOT) (PI#3) & Arrival Sequencing and Metering Area (ASMA) time (PI#4)



Focus on ASMA & AXOT

AXOT

Additional taxi-out times at Copenhagen in 2024 remained very similar to 2023 (EKCH; 2019: 2.59 min/dep.; 2020: 1.4 min/dep.; 2021: 1.52 min/dep.; 2022: 2.37 min/dep.; 2023: 2.59 min/dep.; 2024: 2.53 min/dep.) and below pre-COVID levels and the SES average in 2024 of 2.91 min/dep.

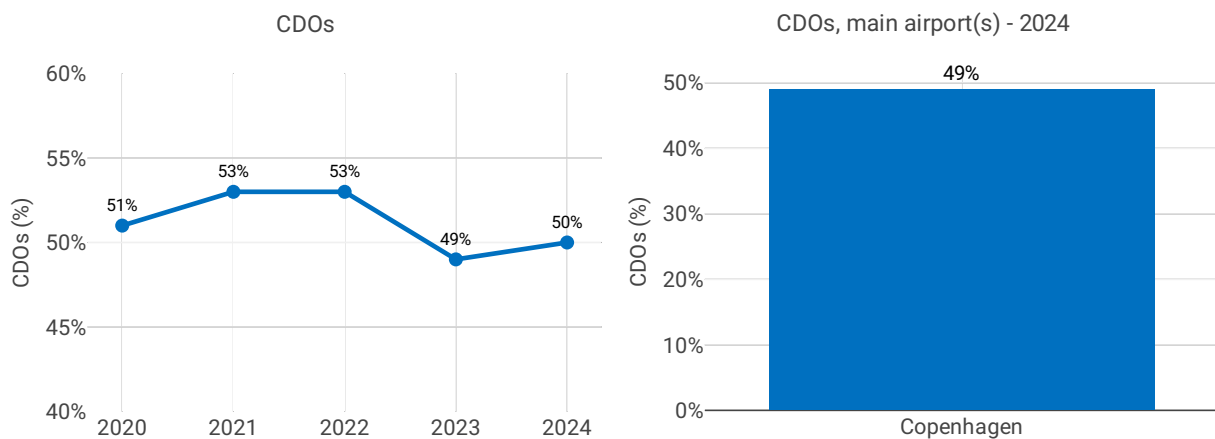
According to the Danish monitoring report: *No initiatives implemented as figures above are affected by airport construction in the previous years during summertime*

ASMA

Additional ASMA times at Copenhagen in 2024 decreased by 13% (EKCH; 2019: 1.07 min/arr.; 2020: 0.9 min/arr.; 2021: 0.52 min/arr.; 2022: 0.78 min/arr.; 2023: 1.1 min/arr.; 2024: 0.96 min/arr.), and below pre-COVID levels and the SES average for 2024 of 1.28 min/arr.

According to the Danish monitoring report: *PBN approaches has been implemented and effect is being monitored*

3.3.2 Share of arrivals applying continuous descent operations (CDOs) (PI#5)



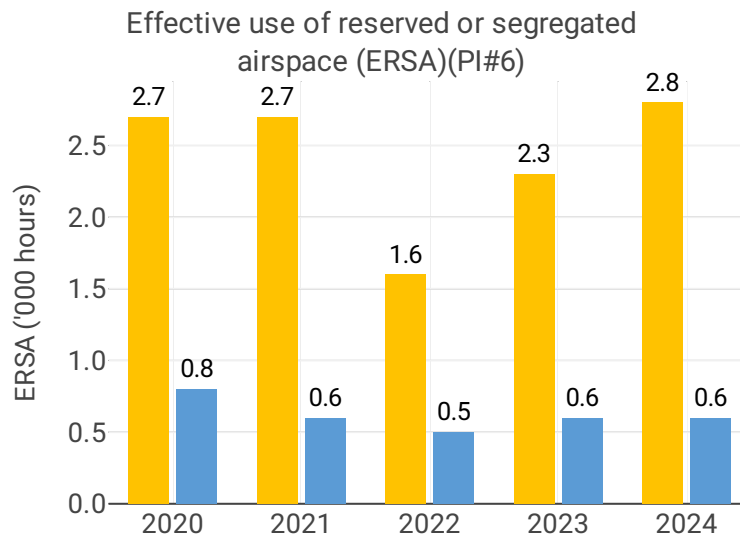
Focus CDOs

The share of CDO flights is 48.6% which is well above the overall RP3 value in 2024 (29.3%) and in the higher range of all observed values in 2024. It is an increase of 2.5 percentage points with respect to 2023.

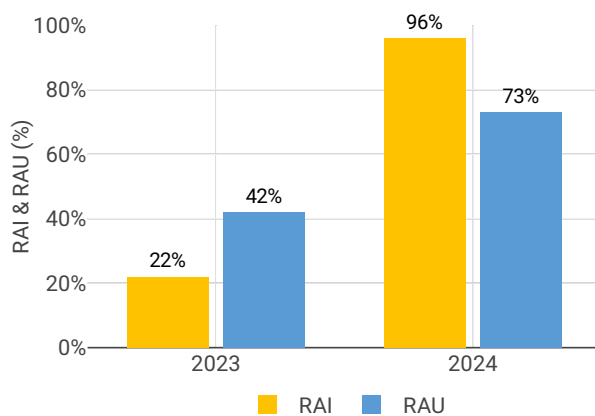
Airport level															
Airport	Additional taxi-out time (PI#3)					Additional ASMA time (PI#4)					Share of arrivals applying CDO (PI#5)				
	2020	2021	2022	2023	2024	2020	2021	2022	2023	2024	2020	2021	2022	2023	2024
Copenhagen	1.40	1.52	2.37	2.59	2.53	0.90	0.52	0.78	1.10	0.96	50%	51%	50%	46%	49%



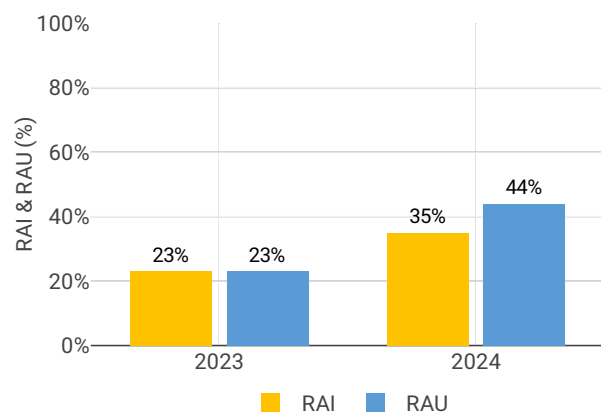
3.4 Civil-Military dimension



RAI & RAU via available conditional routes (PIs#7 & 8)



RAI & RAU via available restricted and segregated airspace (PIs#7 & 8)



Focus on Civil-Military dimension

Update on Military dimension of the plan

The airspace design and procedures used are created in order to minimise the negative effects on the environmental performance.

Military - related measures implemented or planned to improve capacity

FUA is fully implemented in Denmark. NSA, ANSP and Military cooperates with the scope of further reduction of impact of the military dimension.

Initiatives implemented or planned to improve PI#6

NSA monitors the performance via regularly reporting as well as FUA Level 1 where the NSA and the Military evaluates the performance with the scope of further improvement if possible.



Initiatives implemented or planned to improve PI#7

Neither Naviar or the NSA have this data available and have no plans to monitor this at local level but is using Eurocontrol numbers when available. Free route airspace is implemented which is expected to decrease the use of CDRs.

Initiatives implemented or planned to improve PI#8

Neither Naviar or the NSA have this data available and have no plans to monitor this at local level but are using Eurocontrol numbers when available. Furthermore free route airspace is implemented.



4 CAPACITY - DENMARK

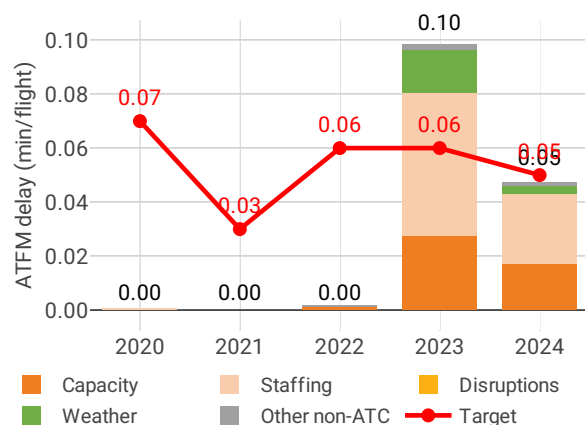
4.1 PRB monitoring

- Denmark registered 0.05 minutes of average en route ATFM delay per flight during 2024, which remained 0.05 after the post-ops adjustment process, thus achieving the local target value of 0.05. Delays in Denmark decreased by 0.05 minutes per flight year-on-year.
- Delays were highest in June, July and September, mostly due to ATC Capacity and Staffing issues.
- The share of delayed flights with delays longer than 15 minutes in Denmark increased by 2 percentage points compared to 2023 and was higher than 2019 values.
- The average number of IFR movements was 11% below 2019 levels in Denmark in 2024.
- The number of ATCOs in OPS is 101, being over the 2024 plan in Copenhagen by 2 FTEs.
- The yearly total of sector opening hours in Copenhagen ACC was 44,464, showing a 0.3% decrease compared to 2023. Sector opening hours are 0.5% below 2019 levels.
- Copenhagen ACC registered 11.62 IFR movements per one sector opening hour in 2024, being 10.0% below 2019 levels.
- Denmark registered an average airport arrival ATFM delay of 0.50 minutes per flight in 2024, thus not achieving the local target of 0.10 minutes.
- Compared to 2023, average arrival ATFM delays in Denmark were 84% lower in 2024, while the number of IFR arrivals increased by 6%.
- The main drivers of delays were ATC staffing, accounting for 56% of delays, and weather, responsible for 33%.

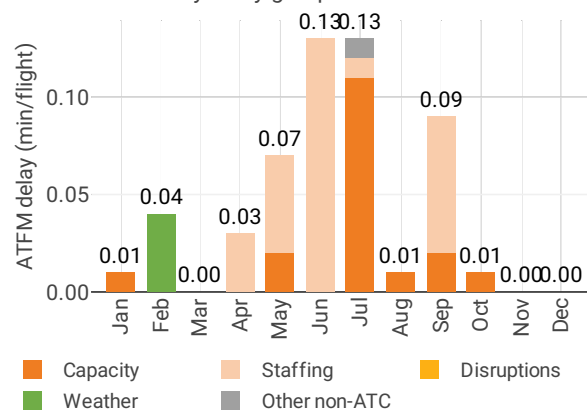
4.2 En route performance

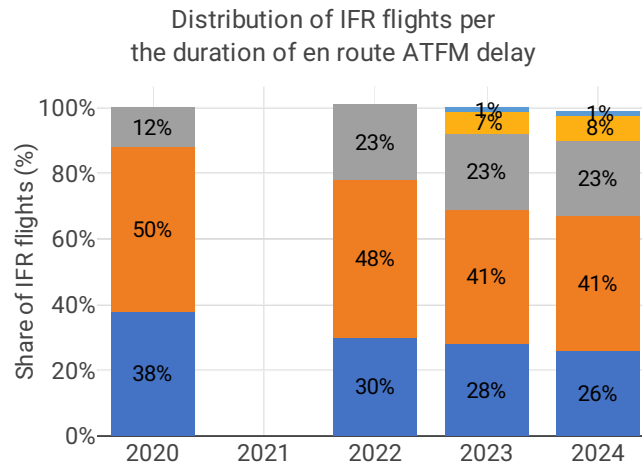
4.2.1 En route ATFM delay (KPI#1)

Average en route ATFM delay per flight by delay groups



Monthly distribution of en route ATFM delay by delay groups - 2024





Focus on en route ATFM delay

Summary of capacity performance

Denmark experienced an increase in traffic from 559k flights in 2023, to 594k flights in 2024. ATFM delays reduced from 56k minutes in 2023 to 28k minutes in 2024. There were still fewer flights than in 2019 (669k).

NSA's assessment of capacity performance

Traffic in Danish Airspace is still affected by the closure of Russian Airspace leading to rerouting of international flights. In 2024, the en-route ATFM delay target was met.

Although recruitment efforts are ongoing, challenges remain. Naviair has implemented remedial actions, including training and ATCO recruitment, but the NSA notes that associated risks to capacity and service delivery persist. Additionally, increased traffic flows in western sectors and new segregated military airspaces are being monitored for impact.

Monitoring process for capacity performance

Monitoring process are in place and coordinated with the NM.

Capacity planning

Monitoring process are in place and coordinated with the NM.

Application of Corrective Measures for Capacity (if applicable)

NSA is in dialogue with the ANSP to ensure the best possible capacity in the years ahead. In 2025 new reserved/segregated airspaces have been implemented for Military training activities which might affect the capacity. The effect is being monitored.

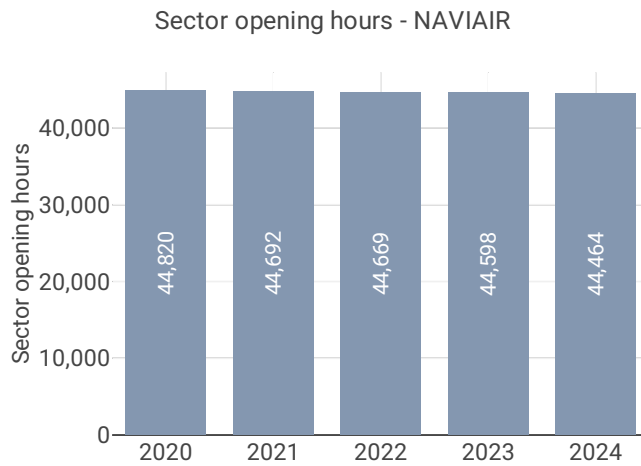
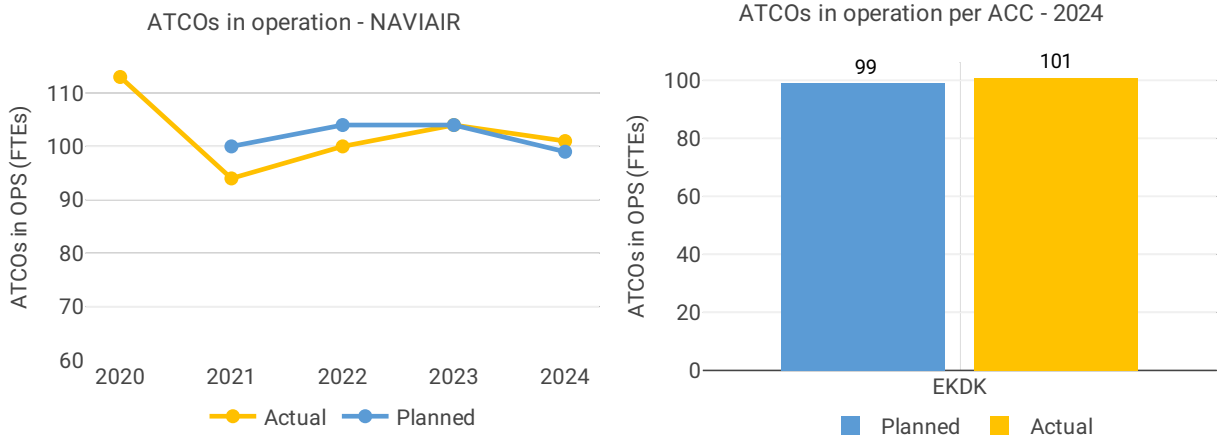
En route Capacity Incentive Scheme

NAVIAIR: The NSA reports that the ANSP performance falls within the deadband range and therefore neither bonus nor malus is applicable.

In accordance with Article 3(3)(a) of Implementing Regulation (EU) 2020/1627: The incentive scheme shall cover only the calendar years 2022 to 2024.



4.2.2 Other indicators



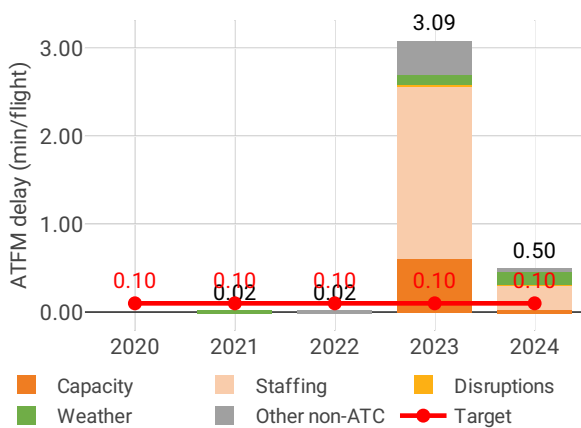
Focus on ATCOs in operations

n/a

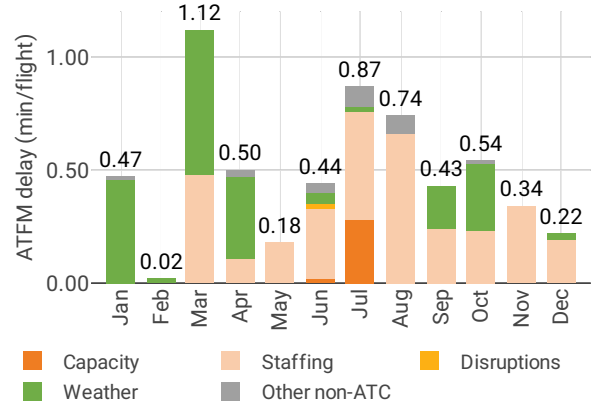
4.3 Terminal performance

4.3.1 Arrival ATFM delay (KPI#2)

Average arrival ATFM delay per flight by delay groups



Monthly distribution of arrival ATFM delay by delay groups - 2024



Focus on arrival ATFM delay

Denmark only has Copenhagen/Kastrup (EKCH) airport subject to RP3 monitoring for which the APDF is successfully established and the monitoring of the capacity indicators can be performed. Traffic at this airport in 2024 was still 9% lower than in 2019, but 6% higher than in 2023.

Average arrival ATFM delay in 2024 was 0.5 min/arr, a drastic reduction with respect to 2023 when delays were extremely high due to lack of ATCO resources. Regardless of this reduction, the national target was not met and there are still capacity issues due to staffing shortage. ATFM slot adherence remained very high (2023: 98.8%; 2024: 99.3%).

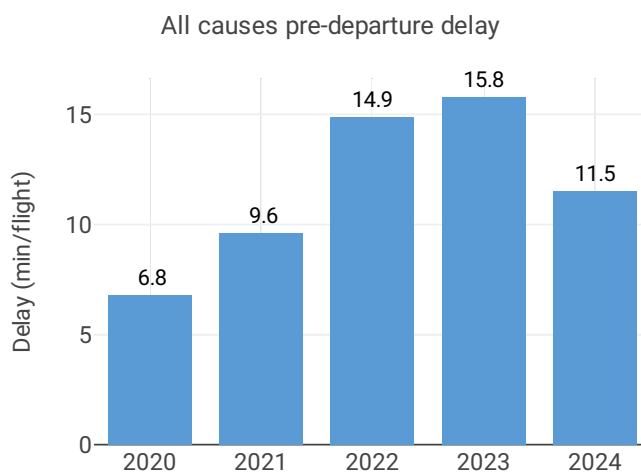
Copenhagen had registered until 2023 nearly zero delays, but in 2023 observed significant arrival ATFM delays due to ATC staffing issues. Performance in 2024 has improved but some of the delays persist (EKCH; 2019: 0.07 min/arr; 2020: 0 min/arr; 2021: 0.02 min/arr; 2022: 0.02 min/arr; 2023: 3.09 min/arr; 2024: 0.5 min/arr.). 56% of the delays in 2024 were attributed to ATC Staffing, followed by 33% of Weather.

According to the Danish monitoring report: *There were still capacity issues due to staffing shortage. The NSA is aware that recruitment and training are ongoing, with associated risks related to staffing levels and service delivery.*

The Danish performance plan sets a national target on arrival ATFM delay for all RP3 of 0.1 min/arr. This target was not met in 2024 with an actual performance of 0.5 min/arr.

According to the Danish monitoring report, this performance corresponds to the maximum penalty (0.50%), automatically computed as DKK 930497.9398.

4.3.2 Other terminal performance indicators (PI#1-3)



Airport level										
Airport name	Avg arrival ATFM delay (KPI#2)					Slot adherence (PI#1)				
	2020	2021	2022	2023	2024	2020	2021	2022	2023	2024
Copenhagen	NA	0.02	0.02	3.09	0.50	98.7%	99.2%	98.9%	98.8%	99.3%

Airport name	ATC pre departure delay (PI#2)					All causes pre departure delay (PI#3)				
	2020	2021	2022	2023	2024	2020	2021	2022	2023	2024
Copenhagen	0.02	0.13	0.04	0.62	0.10	6.8	9.6	14.9	15.8	11.5



Focus on performance indicators at airport level

ATFM slot adherence

Copenhagen's ATFM slot compliance in 2024 was 99.3%, showing a consistent good performance. With regard to the 0.7% of flights that did not adhere, 0.6% were early and 0.1% were late.

According to the Danish monitoring report: *Performance is stable. NSA monitors the performance via monthly reports from the ANSP, and yearly evaluation.*

ATC pre-departure delay

ATC pre-departure delay at Copenhagen (EKCH: 2021: 0.13 min/dep; 2022: 0.04 min/dep; 2023: 0.62 min/dep; 2024: 0.10 min/dep) decreased significantly in 2024 and got closer to the pre-pandemic value (0.09 min/dep)

All causes pre-departure delay

Influenced by the trend and underlying causes observed above, the total (all causes) delay in the actual off block time at Copenhagen decreased in 2024 (EKCH: 2020: 6.79 min/dep.; 2021: 9.63 min/dep.; 2022: 14.9 min/dep.; 2023: 15.79 min/dep.; 2024: 11.52 min/dep.)



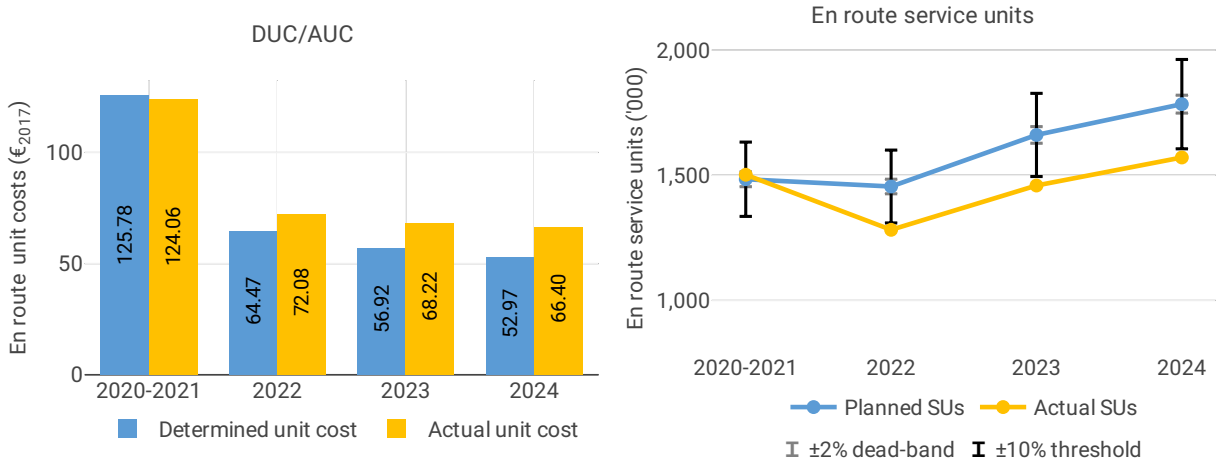
5 COST-EFFICIENCY - DENMARK

5.1 PRB monitoring

- The en route 2024 actual unit cost of Denmark was 66.40€2017, +25% higher than the determined unit cost (52.97€2017). The terminal 2024 actual unit cost was 157.46€2017, +13% higher than the determined unit cost (139.13€2017).
- The en route 2024 actual service units (1.6M) were -12% lower than the determined service units (1.8M), mainly due to shifted traffic flows caused by Russia’s war of aggression against Ukraine.
- The en route 2024 actual total costs were +10M€2017 (+10%) higher than determined. This was mainly driven by higher staff costs for NAVIAIR (+8.8M€2017, or +19%). The NSA explains that this is due to wage increases resulting from a collective agreement for all government employees, the execution of an agreement with the ATCO union, as well as a high level of extra shifts. The NSA did not provide sufficient information on the reason for these additional shifts, which contrasts with the significant reduction in service units compared to the plan.
- NAVIAIR costs of investments were 19M€2017 in 2024 for both en route and terminal charging zones, -7.0% less than determined (20M€2017). According to the NSA, this reduction is due to reduced depreciation resulting from “fewer and postponed investments, and later date of entry into operation than planned”.
- The en route actual unit cost incurred by users in 2024 was 64.52€ (+16% above the 2024 DUC), while the terminal actual unit cost incurred by users was 162.15€ (+10% above the 2024 DUC).
- The en route regulatory result for NAVIAIR amounted to -11M€. The loss is mainly attributable to the application of the cost risk sharing mechanism, in particular the negative difference between determined and actual costs to be borne by the ANSP.

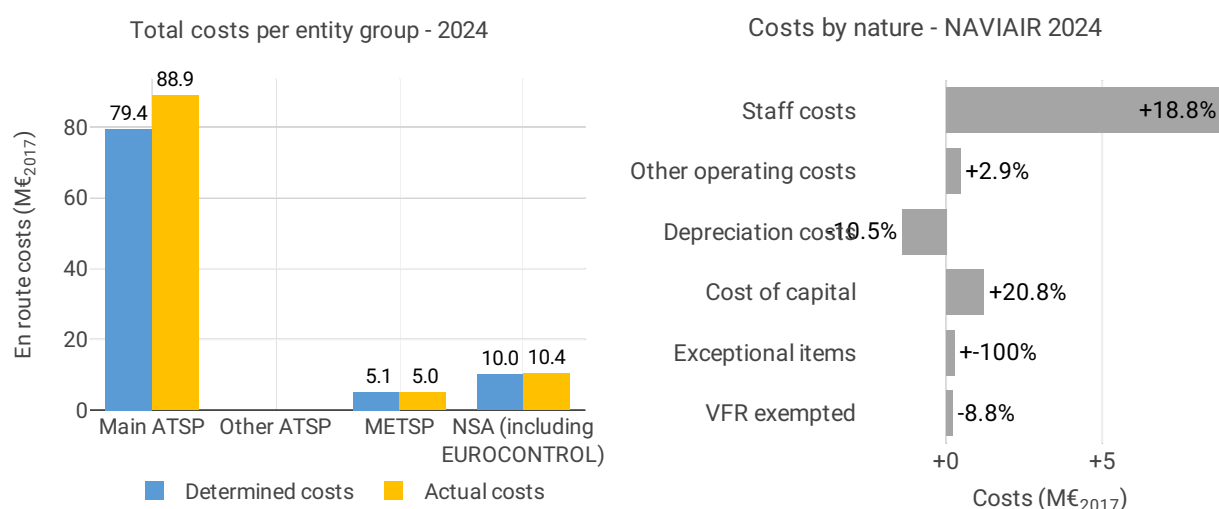
5.2 En route charging zone

5.2.1 Unit cost (KPI#1)



Actual and determined data				
Total costs - nominal (M€)	2020-2021	2022	2023	2024
Actual costs	190	100	111	118
Determined costs	190	96	98	99
Difference costs	0	4	12	18

Inflation assumptions	2020-2021	2022	2023	2024
Determined inflation rate	NA	1.4%	1.5%	1.6%
Determined inflation index	NA	104.2	105.7	107.4
Actual inflation rate	NA	8.5%	3.4%	1.3%
Actual inflation index	NA	112.5	116.3	117.8
Difference inflation index (p.p.)	NA	+8.2	+10.5	+10.4



Focus on unit cost

AUC vs. DUC

In 2024, the en route AUC was +25.4% (or +99.90 DKK₂₀₁₇, +13.43 €₂₀₁₇) higher than the planned DUC. This results from the combination of significantly lower than planned TSUs (-12.0%) and significantly higher than planned en route costs in real terms (+10.4%, or +72.8 MDKK₂₀₁₇, +9.8 M€₂₀₁₇). It should be noted that the actual inflation index in 2024 was +10.4 p.p. higher than planned.

En route service units

The difference between actual and planned TSUs (-12.0%) falls outside the ±10% threshold foreseen in the traffic risk sharing mechanism. The resulting loss of en route revenues is therefore shared between the ANSP and the airspace users (see the main ANSP loss in Box 11).

En route costs by entity

Actual real en route costs are +10.4% (+9.8 M€₂₀₁₇) higher than planned. This is the result of higher costs for the main ANSP, NAVIAIR (+12.0%, or +9.5 M€₂₀₁₇) and the NSA/EUROCONTROL (+4.0%, or +0.4 M€₂₀₁₇) and lower costs for the MET service provider (-2.7%, or -0.1 M€₂₀₁₇).



En route costs for the main ANSP at charging zone level

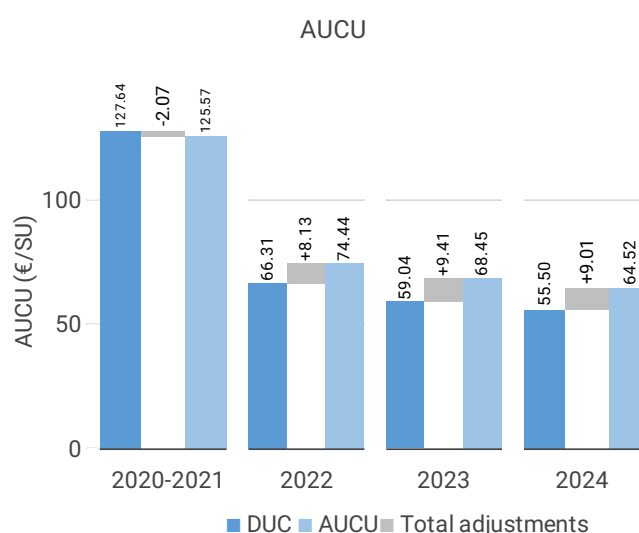
Significantly higher than planned en route costs in real terms for NAVIAIR in 2024 (+12.0%, or +9.5 M€2017) result from:

- Significantly higher staff costs (+18.8%), explained by i) higher than expected “*wage increases due to collective agreement regarding all government employees*”, ii) effects from a capacity-oriented collective agreement with ATCOs made in 2023, and iii) a high level of extra shifts,
- Higher other operating costs (+2.9%), reflecting the impact of inflation and higher training costs,
- Significantly lower depreciation (-10.5%) reflecting “*fewer and postponed investments, and later date of entry into operation than planned*”,
- Significantly higher cost of capital (+20.8%), resulting from a combination of higher interest rates and a higher than planned asset base,
- No deduction through exceptional costs which was included in the PP (negative amount) to reduce the level of en route cost-base.

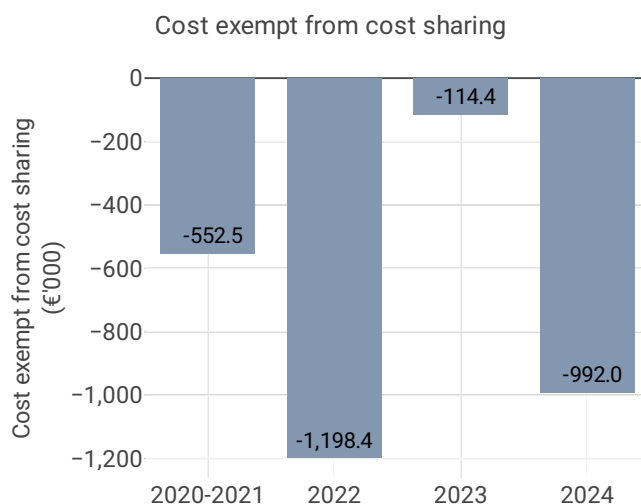
RP3 summary

When considering the whole of RP3 (2020-2024) for Denmark en route charging zone, actual TSUs are -8.9% lower than planned, while actual costs in real terms are +2.8% higher than the determined costs (some +97.1 MDKK2017 or +13.1 M€2017). As a result, the weighted average actual unit cost over RP3 (617.30 DKK2017 or 83.01 €2017) is +12.9% higher than planned in the PP (546.92 DKK2017 or 73.54 €2017).

5.2.2 Actual unit cost incurred by the users (AUCU) (PI#1)



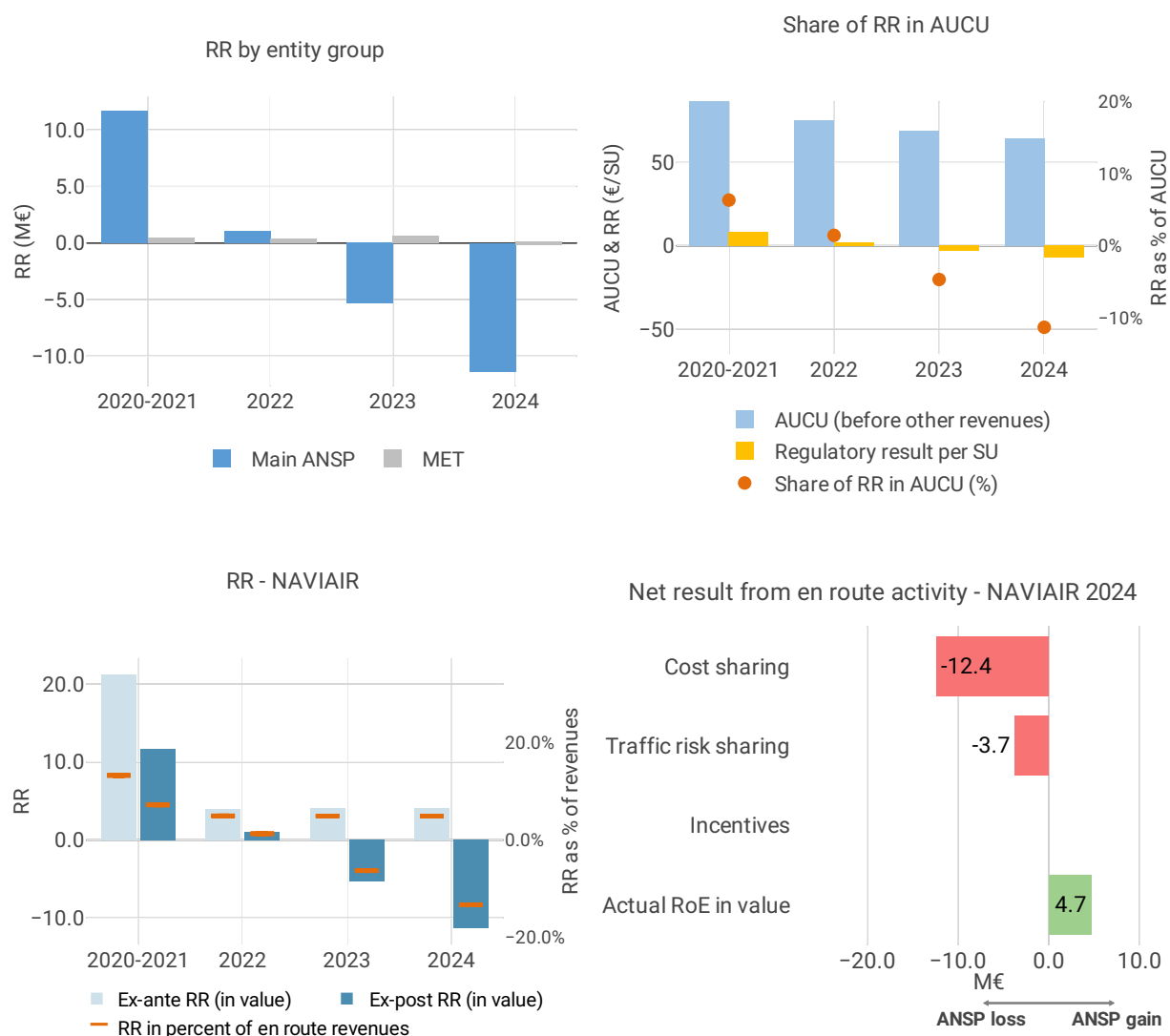
AUCU components (€/SU) – 2024	
Components of the AUCU in 2024	€/SU
DUC	55.50
Inflation adjustment	4.26
Cost exempt from cost-sharing	-0.63
Traffic risk sharing adjustment	4.03
Traffic adj. (costs not TRS)	1.17
Financial incentives	0.00
Modulation of charges	0.00
Cross-financing	0.00
Other revenues	0.18
Application of lower unit rate	0.00
Total adjustments	9.01
AUCU	64.52
AUCU vs. DUC	+ 16.2%



Cost exempt from cost sharing – 2024		
Cost exempt from cost sharing by item - 2024	€'000	€/SU
New and existing investments	-1,394.7	-0.89
Competent authorities and qualified entities costs	329.9	0.21
Eurocontrol costs	72.8	0.05
Pension costs	0.0	0.00
Interest on loans	0.0	0.00
Changes in law	0.0	0.00
Total cost exempt from cost risk sharing	-992.0	-0.63



5.2.3 Regulatory result (RR)



Focus on regulatory result

NAVIAIR net gain/loss on activity in the Denmark en route charging zone in the year 2024

NAVIAIR reported a net loss of -120.1 MDKK, as a combination of a loss of -92.6 MDKK arising from the cost sharing mechanism, with a loss of -27.4 MDKK arising from the traffic risk sharing mechanism.

NAVIAIR overall regulatory result (RR) for the en route activity

Ex-post, the overall RR taking into account the net loss from the en route activity mentioned above (-120.1 MDKK) and the actual RoE (+35.4 MDKK) amounts to -84.7 MDKK (-13.4% of the en route revenues). The resulting ex-post rate of return on equity is negative (-12.0%).

RP3 summary

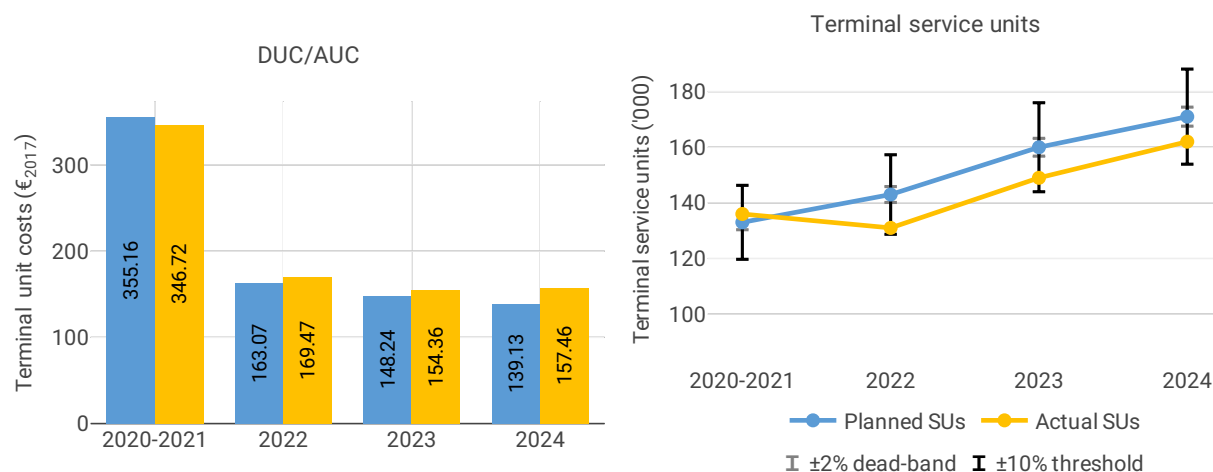
When considering the whole of RP3 (2020-2024), NAVIAIR generated a cumulative loss in respect of cost sharing of -146.2 MDKK, as actual total costs for RP3 were higher than planned. The traffic risk sharing mechanism generated a loss of -66.7 MDKK. Adding the actual RoE



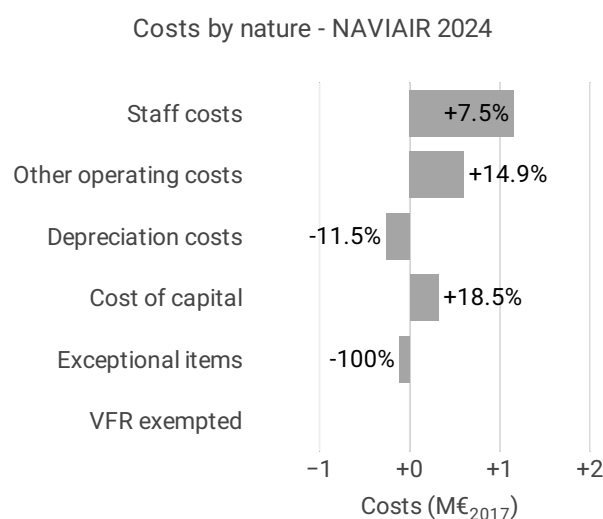
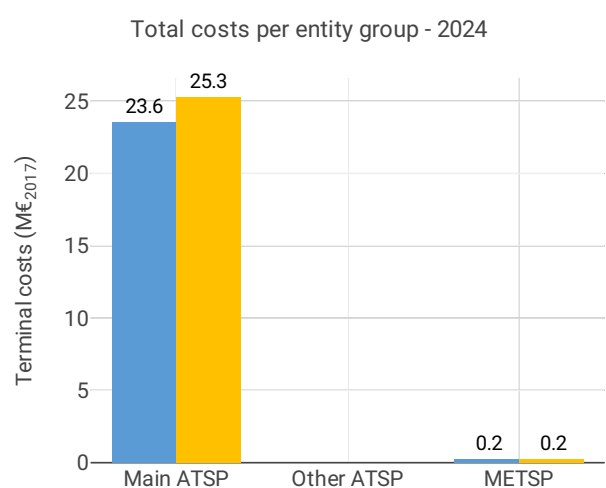
(+183.1 MDKK over RP3) leads to an overall regulatory result of -29.8 MDKK, which corresponds to an average ex-post rate of return on equity of -0.8% (compared to 5.0% initially planned in the PP).

5.3 Terminal charging zone

5.3.1 Unit cost (KPI#1)



Actual and determined data				
Total costs - nominal (M€)	2020-2021	2022	2023	2024
Actual costs	48	24	26	29
Determined costs	48	24	25	25
Difference costs	0	0	1	4
Inflation assumptions	2020-2021	2022	2023	2024
Determined inflation rate	NA	1.4%	1.5%	1.6%
Determined inflation index	NA	104.2	105.7	107.4
Actual inflation rate	NA	8.5%	3.4%	1.3%
Actual inflation index	NA	112.5	116.3	117.8
Difference inflation index (p.p.)	NA	+8.2	+10.5	+10.4



Focus on unit cost

AUC vs. DUC

In 2024, the terminal AUC was +13.2% (or +136.32 DKK2017, +18.33 €2017) higher than the planned DUC. This results from the combination of significantly higher than planned terminal costs in real terms (+7.4%, or +13.1 MDKK2017, +1.8 M€2017) and significantly lower than planned TNSUs (-5.1%). It should be noted that the actual inflation index in 2024 was +10.4 p.p. higher than planned.

Terminal service units

The difference between actual and planned TNSUs (-5.1%) falls outside the $\pm 2\%$ dead-band, but does not exceed the $\pm 10\%$ threshold foreseen in the traffic risk sharing mechanism. The resulting loss of terminal revenues is therefore shared between the ANSP and the airspace users (see the main ANSP loss in Box 11).

Terminal costs by entity

Actual real terminal costs are +7.4% (+1.8 M€2017) higher than planned. This is the result of higher costs for the main ANSP, NAVIAIR (+7.2%, or +1.7 M€2017) and the MET service provider (+31.6%, or +0.1 M€2017).

Terminal costs for the main ANSP at charging zone level

Significantly higher than planned terminal costs in real terms for NAVIAIR in 2024 (+7.2%, or +1.7 M€2017) result from:

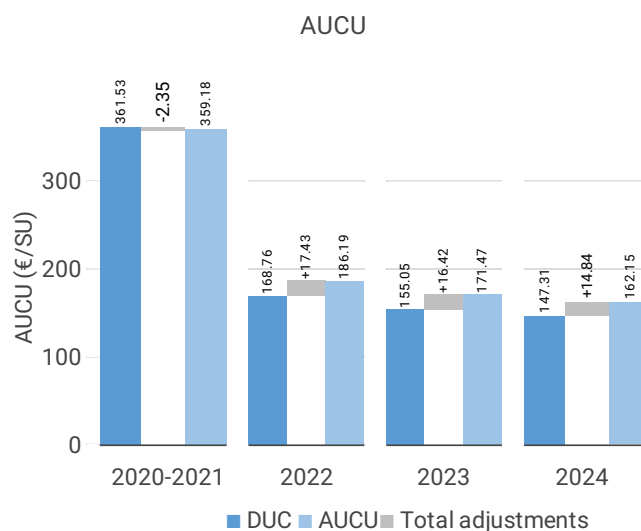
- Significantly higher staff costs (+7.5%), explained by i) higher than expected “*wage increases due to collective agreement regarding all government employees*”, ii) effects from a capacity-oriented collective agreement with ATCOs made in 2023, and iii) a high level of extra shifts.
- Significantly higher other operating costs (+14.9%) reflecting additional costs for training as well as inflation,
- Significantly lower depreciation (-11.5%) reflecting “*fewer and postponed investments, and later dates of entry into operation than planned*”,
- Significantly higher cost of capital (+18.5%) resulting from a combination of higher interest rates and a higher than planned asset base,
- No deduction through exceptional costs which was included in the RP3 PP to reduce the level of the terminal cost-base.

RP3 summary

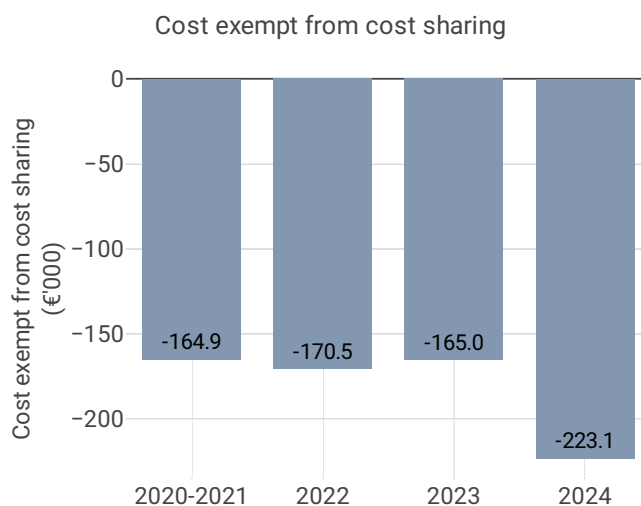
When considering the whole of RP3 (2020-2024) for Denmark terminal charging zone, actual TNSUs are -4.6% lower than planned, while actual costs in real terms are -0.1% lower than the determined costs (some -0.6 MDKK2017 or -0.1 M€2017). As a result, the weighted average actual unit cost over RP3 (1 516.81 DKK2017 or 203.96 €2017) is +4.8% higher than planned in the PP (1 447.61 DKK2017 or 194.65 €2017).



5.3.2 Actual unit cost incurred by the users (AUCU) (PI#1)

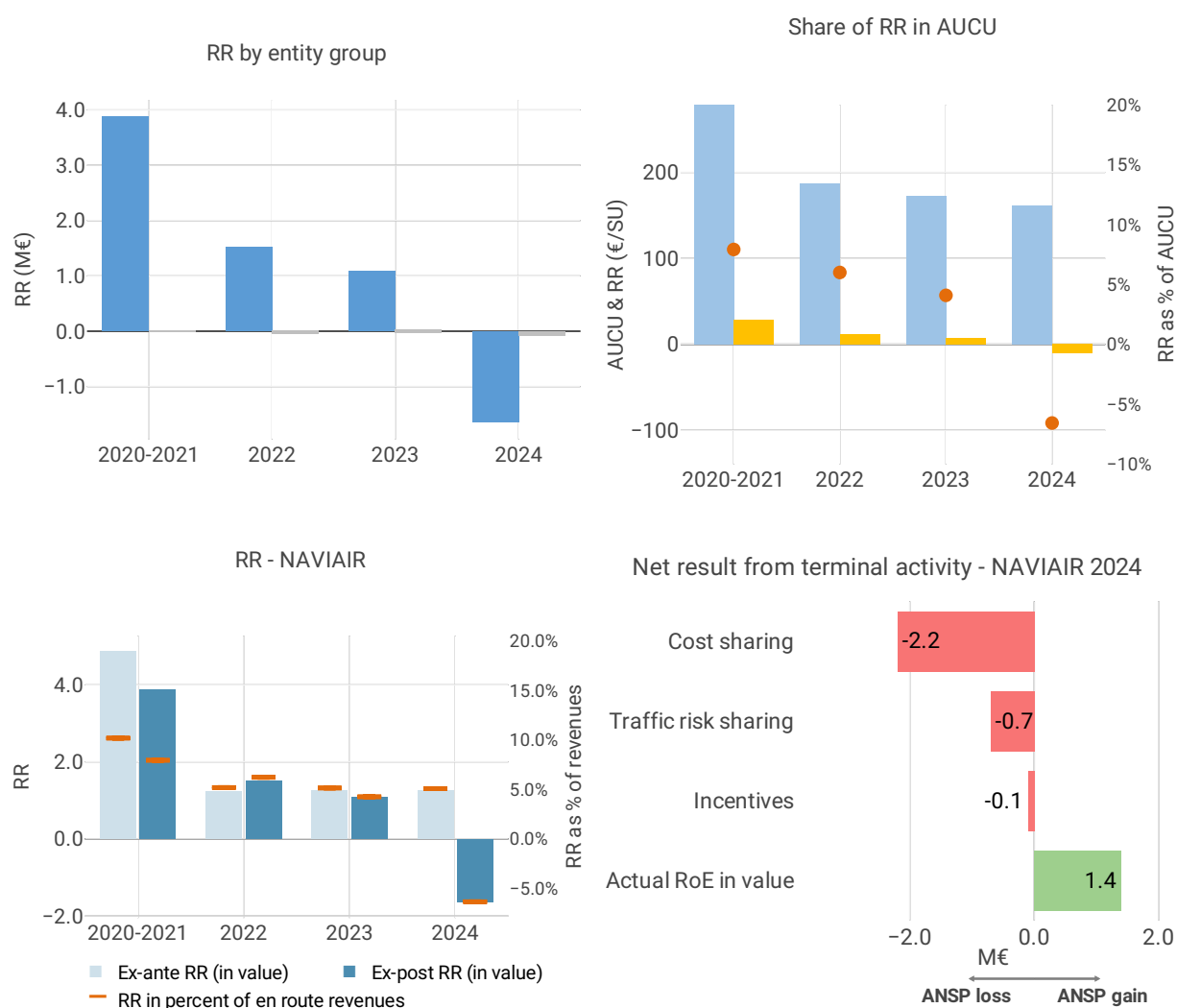


AUCU components (€/SU) - 2024	
Components of the AUCU in 2024	€/SU
DUC	147.31
Inflation adjustment	12.60
Cost exempt from cost-sharing	-1.38
Traffic risk sharing adjustment	3.36
Traffic adj. (costs not TRS)	0.06
Financial incentives	-0.77
Modulation of charges	0.00
Cross-financing	0.00
Other revenues	0.97
Application of lower unit rate	0.00
Total adjustments	14.84
AUCU	162.15
AUCU vs. DUC	+ 10.1%



Cost exempt from cost sharing – 2024		
Cost exempt from cost sharing by item - 2024	€'000	€/SU
New and existing investments	-223.1	-1.38
Competent authorities and qualified entities costs	0.0	0.00
Eurocontrol costs	0.0	0.00
Pension costs	0.0	0.00
Interest on loans	0.0	0.00
Changes in law	0.0	0.00
Total cost exempt from cost risk sharing	-223.1	-1.38

5.3.3 Regulatory result (RR)



Focus on regulatory result

NAVIAIR net gain/loss on activity in the Denmark terminal charging zone in the year 2024

NAVIAIR reported a net loss of -22.8 MDKK, as a combination of a loss of -16.4 MDKK arising from the cost sharing mechanism, with a loss of -5.5 MDKK arising from the traffic risk sharing mechanism and a loss of -0.9 MDKK relating to financial incentives.



NAVIAIR overall regulatory result (RR) for the terminal activity

Ex-post, the overall RR taking into account the net loss from the terminal activity mentioned above (-22.8 MDKK) and the actual RoE (+10.6 MDKK) amounts to -12.3 MDKK (-6.4% of the terminal revenues). The resulting ex-post rate of return on equity is negative (-5.8%).

RP3 summary

When considering the whole of RP3 (2020-2024), NAVIAIR generated a cumulative loss in respect of cost sharing of -4.4 MDKK, as actual total costs for RP3 were higher than planned. The traffic risk sharing mechanism generated a loss of -11.2 MDKK. Adding the loss of -1.8 MDKK to be retained by the ATSP in respect of financial incentives and the actual RoE (+53.3 MDKK over RP3) leads to an overall regulatory result of +35.9 MDKK, which corresponds to an average ex-post rate of return on equity of 3.4% (compared to 5.0% initially planned in the PP).

