

# **Performance Review Board**

## **Monitoring Report**

### **Estonia - 2024**



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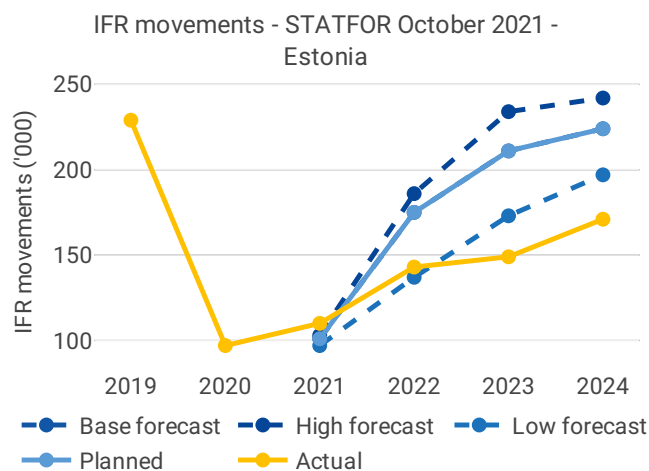
# 1 OVERVIEW

## 1.1 Contextual information

National performance plan adopted following Commission Decision (EU) 2022/771 of 13 April 2022

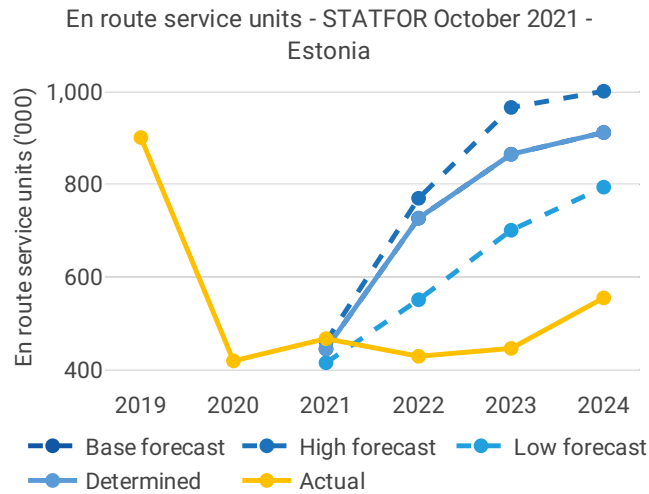
<p><b>List of ACCs</b> 1 Tallinn ACC</p> <p><b>No of airports in the scope of the performance plan:</b></p> <ul style="list-style-type: none"> <li>• ≥80'K 0</li> <li>• &lt;80'K 2</li> </ul>	<p><b>Exchange rate (1 EUR=)</b> 2017: 1 EUR 2024: 1 EUR</p> <p><b>Share of Union-wide:</b></p> <ul style="list-style-type: none"> <li>• traffic (TSUs) 2024 0.4%</li> <li>• en route costs 2024 0.4%</li> </ul> <p><b>Share en route / terminal costs 2024</b> 87% / 13%</p> <p><b>En route charging zone(s)</b> Estonia</p> <p><b>Terminal charging zone(s)</b> Estonia</p>	<p><b>Main ANSP</b></p> <ul style="list-style-type: none"> <li>• EANS</li> </ul> <p><b>Other ANSPs</b> -</p> <p><b>MET Providers</b> -</p>
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## 1.2 Traffic (En route traffic zone)



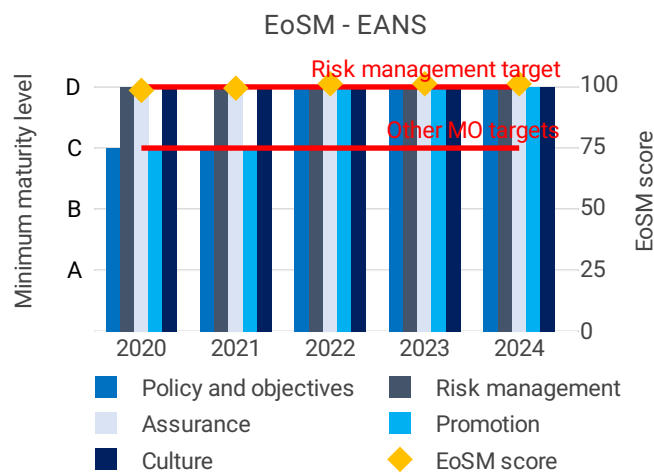
- Estonia recorded 171K actual IFR movements in 2024, +14.8% compared to 2023 (149K).
- Actual 2024 IFR movements were -23.7% below the plan (224K).
- Actual 2024 IFR movements represent 75% of the actual 2019 level (229K).





- Estonia recorded 555K actual service units in 2024, +24.4% compared to 2023 (446K).
- Actual 2024 service units were -39.1% below the plan (912K).
- Actual 2024 service units represent 62% of the actual 2019 level (901K).

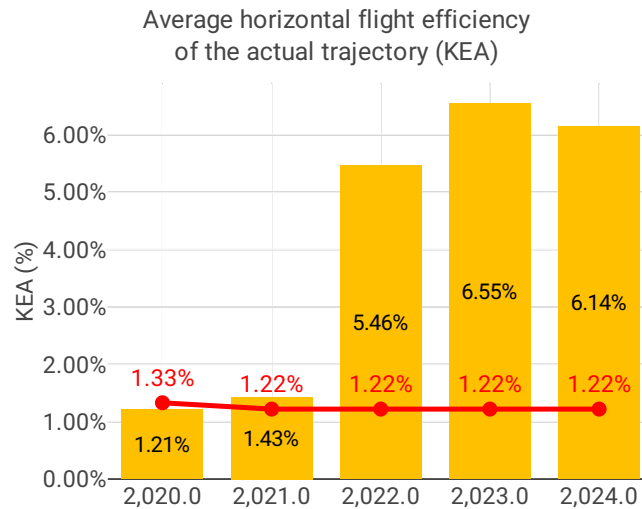
### 1.3 Safety (Main ANSP)



- EANS already achieved the RP3 EoS M targets at the start of the reference period and continued to improve the SMS throughout RP3.
- Estonia recorded a significantly higher rate of runway incursions (RIs) in 2024 compared to 2023, while lowering the rate of separation minima infringements (SMIs).

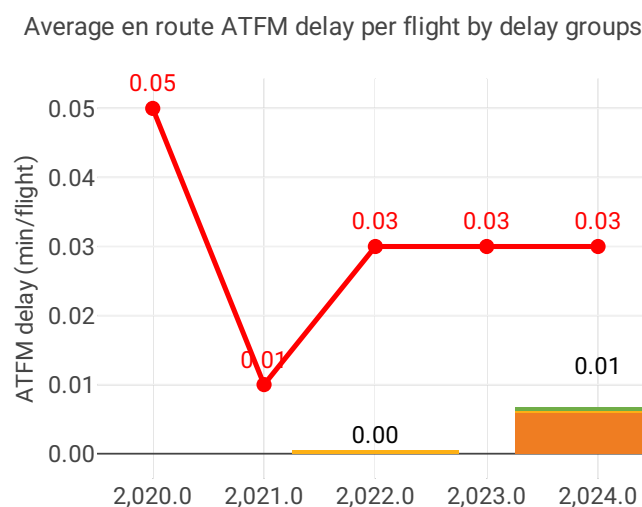


## 1.4 Environment (Member State)



- Estonia achieved a KEA performance of 6.14% compared to its target of 1.22% and did not contribute positively to achieving the Union-wide target.
- The NSA states that the target was not achieved because of the traffic to and from Kaliningrad which does not follow the optimal routes due to the restrictive measures resulting from Russia's war of aggression against Ukraine.
- Both KEP and SCR improved in comparison to 2023. The value of these two indicators is similar, meaning airspace users plan close to the shortest route available.
- The share of CDO flights increased from 65.15% to 70.04% in 2024.
- Additional taxi out time increased from 1.01 to 1.20 min/flight, while additional time in terminal airspace remained stable in 2024 compared to 2023.

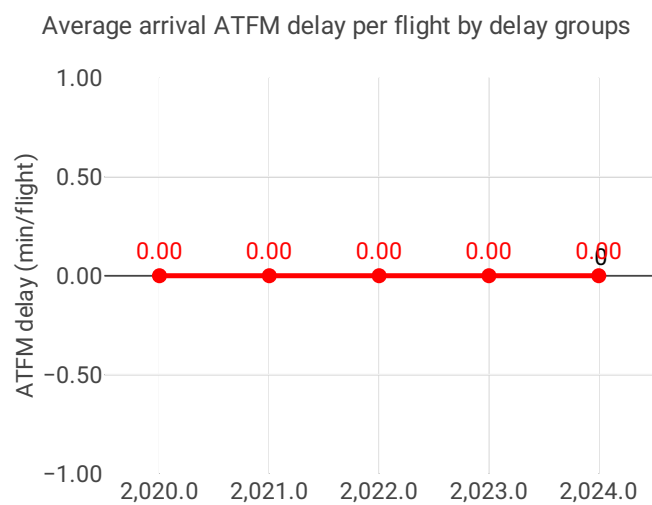
## 1.5 Capacity (Member State)



- Estonia registered 0.01 minutes of average en route ATFM delay per flight during 2024, which remained 0.01 after the post-ops adjustment process, thus achieving the local target value of 0.03. Delays in Estonia increased by 0.01 minutes per flight year-on-year.

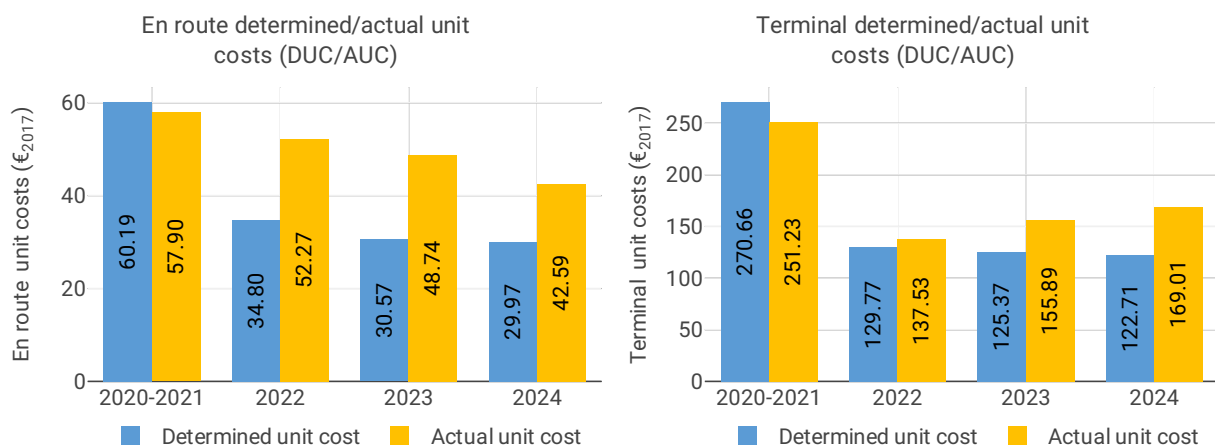


- Delays were highest between July and September, mostly driven by the lack of ATC Capacity.
- The share of delayed flights with delays longer than 15 minutes in Estonia increased by 21 percentage points compared to 2023 and was higher than 2019 values.
- The average number of IFR movements was 25% below 2019 levels in Estonia in 2024.
- The number of ATCOs in OPS is 21, being below the 2024 plan in Tallinn by 6 FTEs.
- The yearly total of sector opening hours in Tallinn ACC was 10,470, showing a 2.5% increase compared to 2023. Sector opening hours are 17.5% below 2019 levels.
- Tallinn ACC registered 15.3 IFR movements per one sector opening hour in 2024, being 12.1% below 2019 levels.



- Estonia registered zero minutes of average airport arrival ATFM delay per flight, thus achieving its local target of zero minutes in 2024.
- Compared to 2023, the number of IFR arrivals in Estonia increased by 15%, while the average airport arrival ATFM delay remained zero minutes.

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



- The en route 2024 actual unit cost of Estonia was 42.59€2017, +42% higher than the determined unit cost (29.97€2017). The terminal 2024 actual unit cost was 169.01€2017, +38% higher than the determined unit cost (122.71€2017).
- The en route 2024 actual service units (0.6M) were -39% lower than the determined service units (0.9M) mainly due to shifted traffic flows caused by Russia's war of aggression against Ukraine.
- The en route 2024 actual total costs were -3.7M€2017 (-14%) lower than determined, with all cost categories registering lower-than-planned costs. The difference is mainly due to lower staff costs (-2.5M€2017, or -21%) for EANS. However, in nominal terms, the actual staff costs show an increase of +2.4% compared to the determined figures.
- EANS costs of investments were 4.9M€2017 in 2024 for both en route and terminal charging zones, -9.7% less than determined (5.4M€2017). According to the NSA, this reduction is due a decrease in depreciation costs following the postponement of new investments.
- The en route actual unit cost incurred by users in 2024 was 60.57€ (+87% above the 2024 DUC), while the terminal actual unit cost incurred by users was 130.40€ (-2.1% below the 2024 DUC). The difference between the AUCU and the DUC for the en route charging zone is primarily attributed to lower than planned service units.
- The en route regulatory result for EANS amounted to +4.9M€, or 19% of the 2024 revenue.
- Estonia should ensure that any excessive regulatory result, including excess funds received by the ANSP due to the inflation mechanism, is either reinvested to improve the quality of services delivered to airspace users or reimbursed to them.

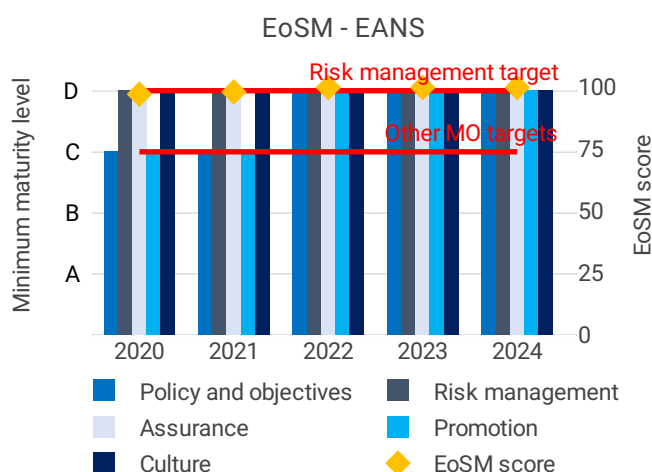


## 2 SAFETY - ESTONIA

### 2.1 PRB monitoring

- EANS already achieved the RP3 EoSM targets at the start of the reference period and continued to improve the SMS throughout RP3.
- Estonia recorded a significantly higher rate of runway incursions (RIs) in 2024 compared to 2023, while lowering the rate of separation minima infringements (SMIs).

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



#### Focus on EoSM

All five EoSM components of the ANSP meet, or exceed the RP3 target level. Maximum maturity level was maintained over 2024.

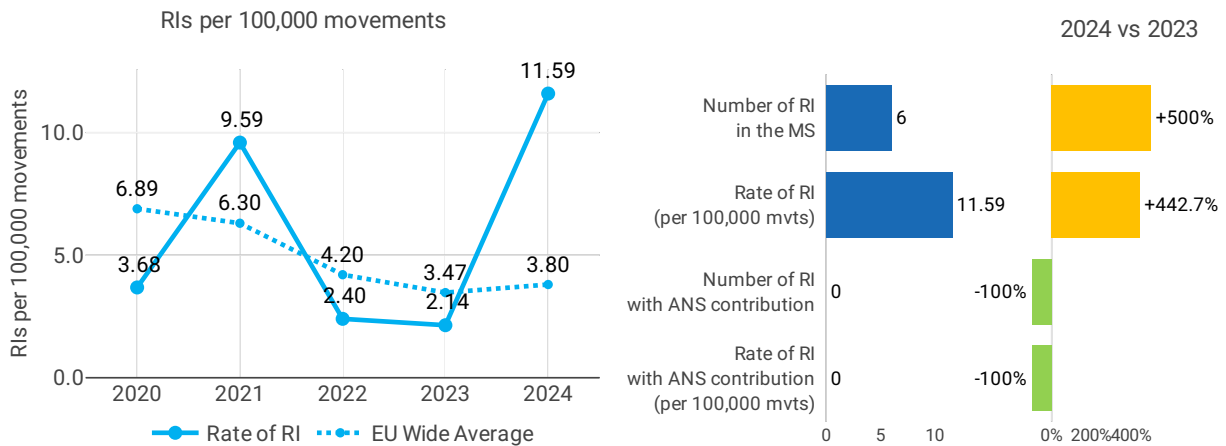
Estonia achieved the RP3 EoSM target levels at the start of the reference period and continued to improve its SMS reaching maturity level D for all Management Objectives already in 2022.

EANS states that it continues to meet its safety performance targets in accordance with the Estonian State safety program, demonstrating effective implementation of its SMS and a sustained commitment to national safety objectives.



## 2.3 Safety occurrences

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



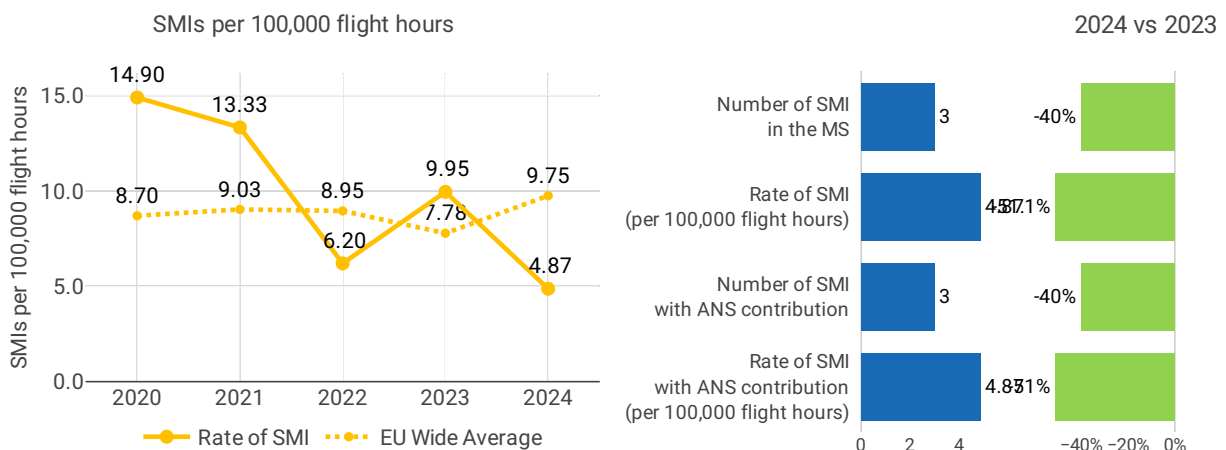
Rate of RIs per 100,000 airport movements - Estonia				
#	Airport name	APT movements	Number of RI	Rate RI per 100,000
1	Tallinn	42,403	0	0.00
2	Tartu	4,109	0	0.00

### Focus on runway incursions

After a peak in 2021, Estonia recorded a stable rate of RIs until 2024, which showed a sharp increase in the rate due to a relative high number of RIs without ANS contribution. The larger airports in Estonia did not contribute to this increase.

The NSA closely monitored the rate of RI occurrences and introduced mitigation measures for all relevant stakeholders (mainly related to vehicle movements and private pilots).

### 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	EANS	33,558	37,464	48,360	50,258	61,600	4	5	3	5	3

#	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	EANS	12	13	6	10	5		+12%	-54%	+60%	-51%

### Focus on separation minima

Estonia started RP3 with a high rate of SMIs exceeding the Union-wide average and started improving in 2022 moving below the average with a downward trend despite the increase in number of flight hours.

The NSA notes that the actions to provide regular training sessions and the improved organization of ATCOs' work has improved the situation regarding SMI occurrences.

#### 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
<b>X</b>	<b>X</b>



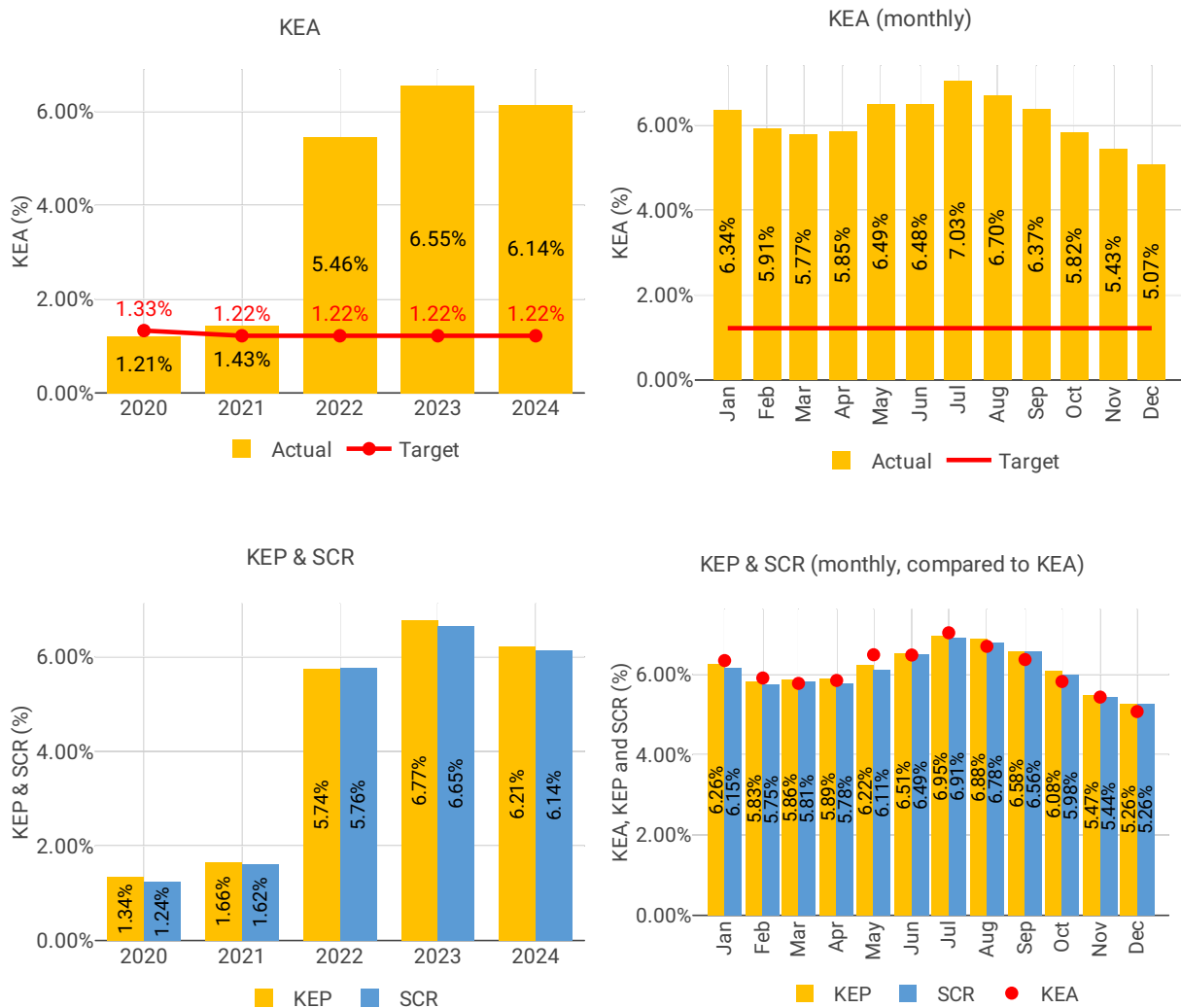
### 3 ENVIRONMENT - ESTONIA

#### 3.1 PRB monitoring

- Estonia achieved a KEA performance of 6.14% compared to its target of 1.22% and did not contribute positively to achieving the Union-wide target.
- The NSA states that the target was not achieved because of the traffic to and from Kaliningrad which does not follow the optimal routes due to the restrictive measures resulting from Russia’s war of aggression against Ukraine.
- Both KEP and SCR improved in comparison to 2023. The value of these two indicators is similar, meaning airspace users plan close to the shortest route available.
- The share of CDO flights increased from 65.15% to 70.04% in 2024.
- Additional taxi out time increased from 1.01 to 1.20 min/flight, while additional time in terminal airspace remained stable 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

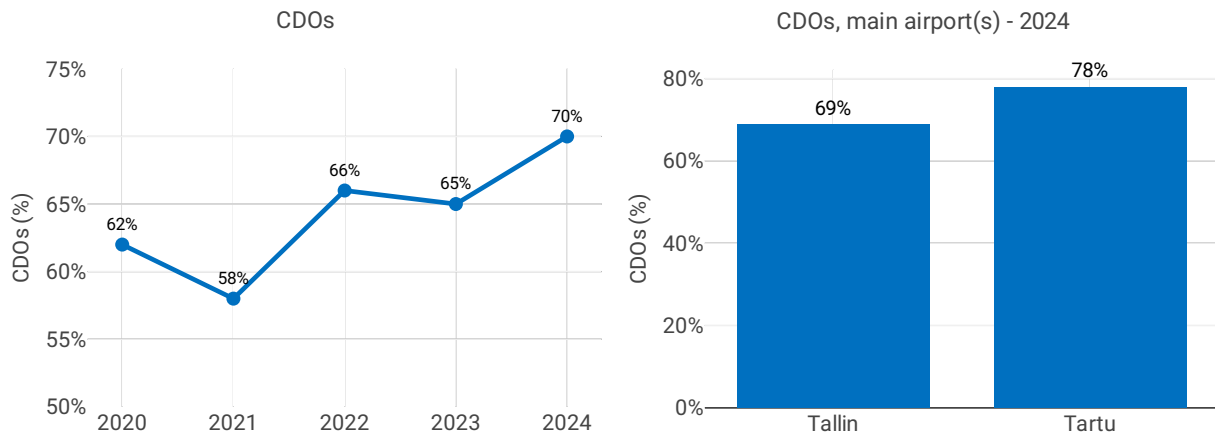
This indicator is not monitored for airports below 80 000 IFR movements average during the 2016-2018 period, so it is not monitored for any airport in this state.

##### ASMA

This indicator is not monitored for airports below 80 000 IFR movements average during the 2016-2018 period, so it is not monitored for any airport in this state.



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



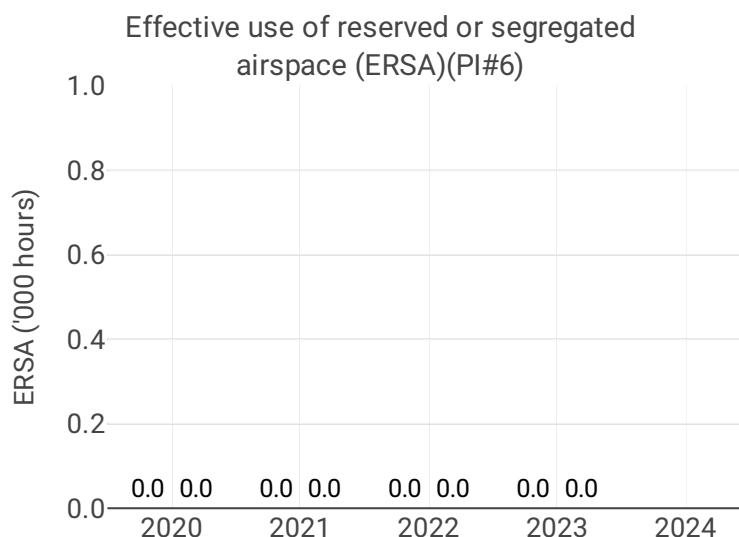
#### Focus CDOs

The share of CDO flights has increased slightly for Tallin (EETN) and has significantly increased again for Tartu (EETU): +29.0 percentage points with respect to 2023. They are well above the overall RP3 value in 2024 (29.3%). Both airports are in the top 10 of all observed values in 2024.

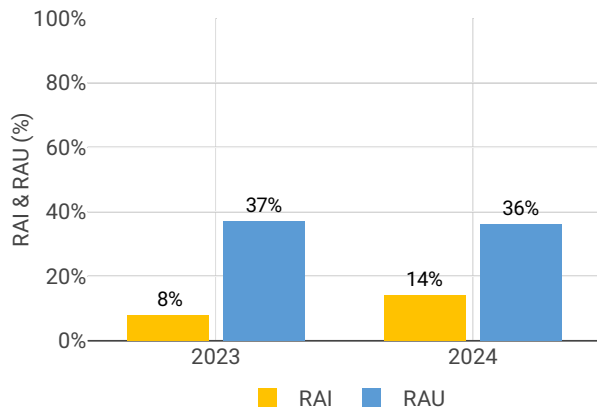
According to the Estonian monitoring report: *Currently CDO is being monitored only statistically via the EUROCONTROL dashboard, no specific targeted actions have been taken so far to further improve the use of CDO. There are plans to focus more on this topic in 2026, including an analysis of the methodology and the results achieved so far. Also, there are plans to provide refresher training for ATCOs as part of this process.*

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
Tallin	0.85	1.03	1.39	1.01	1.20	0.44	0.44	0.19	0.23	0.22	61%	56%	66%	66%	69%
Tartu	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	70%	44%	72%	50%	78%

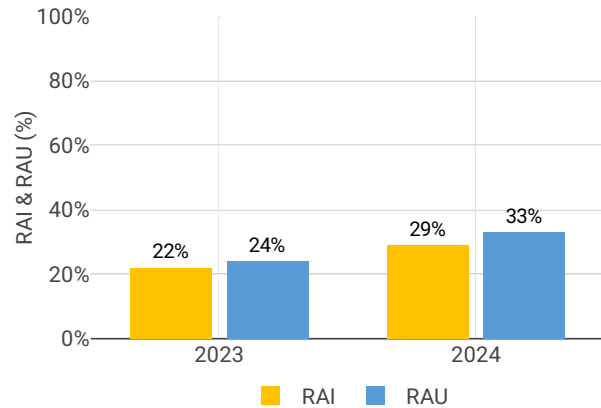
### 3.4 Civil-Military dimension



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



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



## Focus on Civil-Military dimension

### Update on Military dimension of the plan

Owing to Estonia's geographic positioning and geopolitical role, the proportion of military operations in Estonian airspace continues to rise. The airspace planning team works closely with the Air Force to devise optimal strategies, enabling adaptable utilization of SUA and designated airspace zones. Daily operational planning relies on the LARA system, integrated with air traffic control system.

### Military - related measures implemented or planned to improve capacity

There are no specific measures, given the significance and priority for the State, as well as the sensitivity of military operations in the entire region.

### Initiatives implemented or planned to improve PI#6

n/a

### Initiatives implemented or planned to improve PI#7

Estonia has not used CDRs for several years now. We don't have fully segregated airspaces and we also do not allow flight plans for non-participating traffic through reserved airspaces. If a TSA is planned for use in the AUP, the area is closed for flight planning. If the reservation is published in the AUP, no flight plans are allowed in that area. At other times, this airspace is available for flight planning without restrictions.

### Initiatives implemented or planned to improve PI#8

n/a



## 4 CAPACITY - ESTONIA

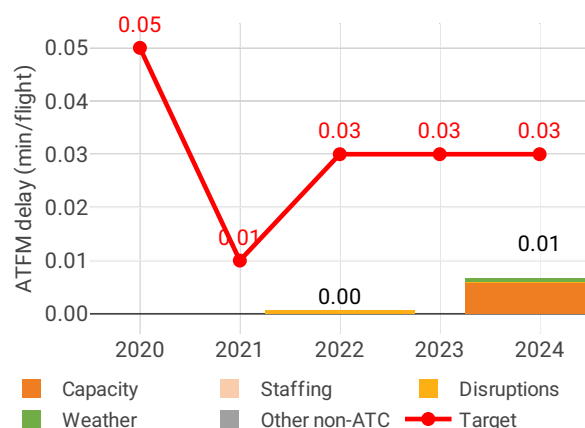
### 4.1 PRB monitoring

- Estonia registered 0.01 minutes of average en route ATFM delay per flight during 2024, which remained 0.01 after the post-ops adjustment process, thus achieving the local target value of 0.03. Delays in Estonia increased by 0.01 minutes per flight year-on-year.
- Delays were highest between July and September, mostly driven by the lack of ATC Capacity.
- The share of delayed flights with delays longer than 15 minutes in Estonia increased by 21 percentage points compared to 2023 and was higher than 2019 values.
- The average number of IFR movements was 25% below 2019 levels in Estonia in 2024.
- The number of ATCOs in OPS is 21, being below the 2024 plan in Tallinn by 6 FTEs.
- The yearly total of sector opening hours in Tallinn ACC was 10,470, showing a 2.5% increase compared to 2023. Sector opening hours are 17.5% below 2019 levels.
- Tallinn ACC registered 15.3 IFR movements per one sector opening hour in 2024, being 12.1% below 2019 levels.
- Estonia registered zero minutes of average airport arrival ATFM delay per flight, thus achieving its local target of zero minutes in 2024.
- Compared to 2023, the number of IFR arrivals in Estonia increased by 15%, while the average airport arrival ATFM delay remained zero minutes.

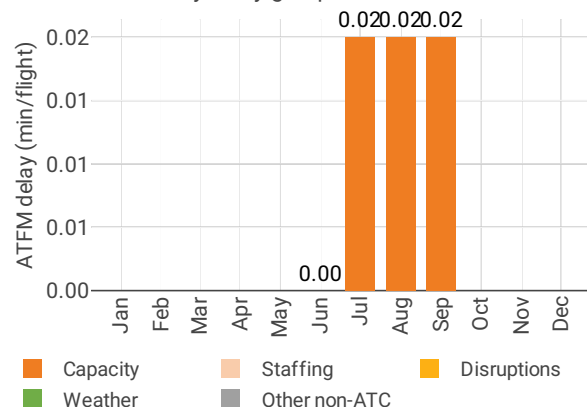
### 4.2 En route performance

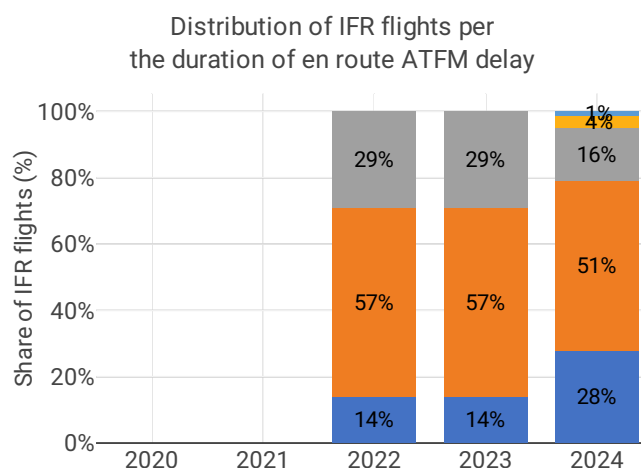
#### 4.2.1 En route ATFM delay (KPI#1)

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

Estonia experienced an increase in traffic from 148k flights in 2023, to 170k flights in 2024, with just over 1k minutes of en route ATFM delay. Traffic levels remain significantly below the 227k flights handled in 2019.

### NSA's assessment of capacity performance

The enroute capacity target for Estonia in 2024 was set at 0.03 minutes of ATFM delay per flight. Despite an overall increase in the number of flights during the year, EANS has achieved a result with the actual ATFM delay per flight recorded at only 0.01 minutes. This performance reflects effective management and coordination within the ANSP.

The number of reports related to ATCO fatigue increased in 2024, highlighting the growing challenges faced by controllers in maintaining optimal performance under increased workload conditions. To address these challenges, efforts are being made to optimize ATCO work through the implementation of technical solutions.

### Monitoring process for capacity performance

Review of the actual values from the NM dashboard. The 0.01 delay registered is related to prearrival sequencing for Helsinki Vantaa airport.

### Capacity planning

The shift supervisor is the tactical FMP, who plans according to the traffic flows. Flows are coordinated with the Network Manager as needed.

### Application of Corrective Measures for Capacity (if applicable)

The number of reports related to ATCO fatigue increased in 2024 (6 vs 3 in 2023), highlighting the growing challenges faced by controllers in maintaining optimal performance under increased workload conditions.

ATCO fatigue has been identified as a safety issue and is being actively addressed by EANS. Although no direct safety related incidents resulting from fatigue were reported in 2024, and therefore no immediate corrective actions were deemed necessary, the issue continues to be monitored closely.



All fatigue related reports and associated data were thoroughly analysed by the members of the Fatigue Safety Action Group (FSAG). Based on their findings, the FSAG team provided recommendations aimed at preventing potential fatigue-related situations in the future.

In 2024, the implementation of a self-assessment system for fatigue management was postponed and refocused, with the revised plan scheduled for rollout in 2025. Under the updated approach, ATCOs will assess their fatigue levels using the Samn-Perelli scale at a dedicated terminal, which will be located separately from the operational working position. This measure is intended to reduce any potential influence on flight safety during the self-assessment process.

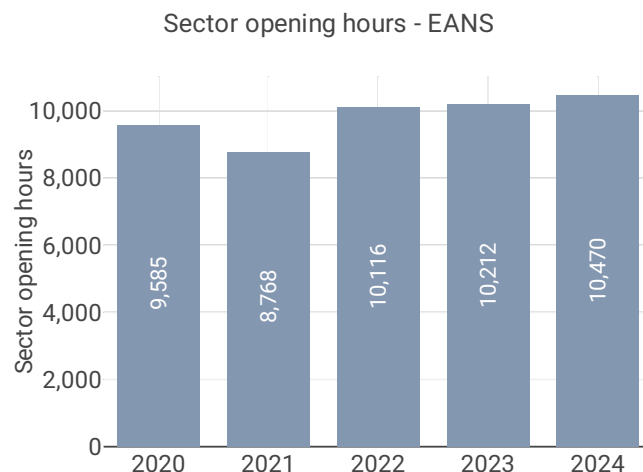
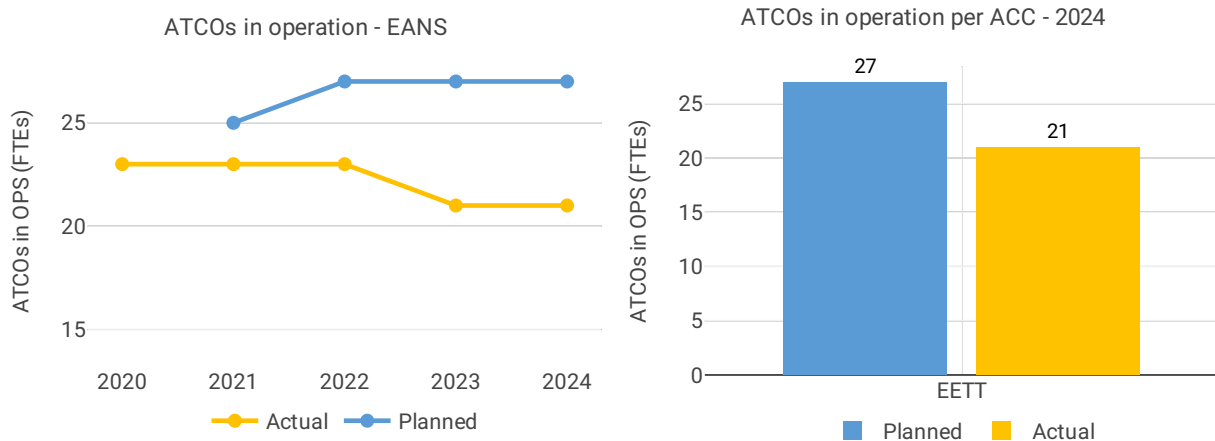
The Estonian Transport Administration will re-evaluate the associated risks in cooperation with EANS in 2025.

### En route Capacity Incentive Scheme

**EANS:** 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

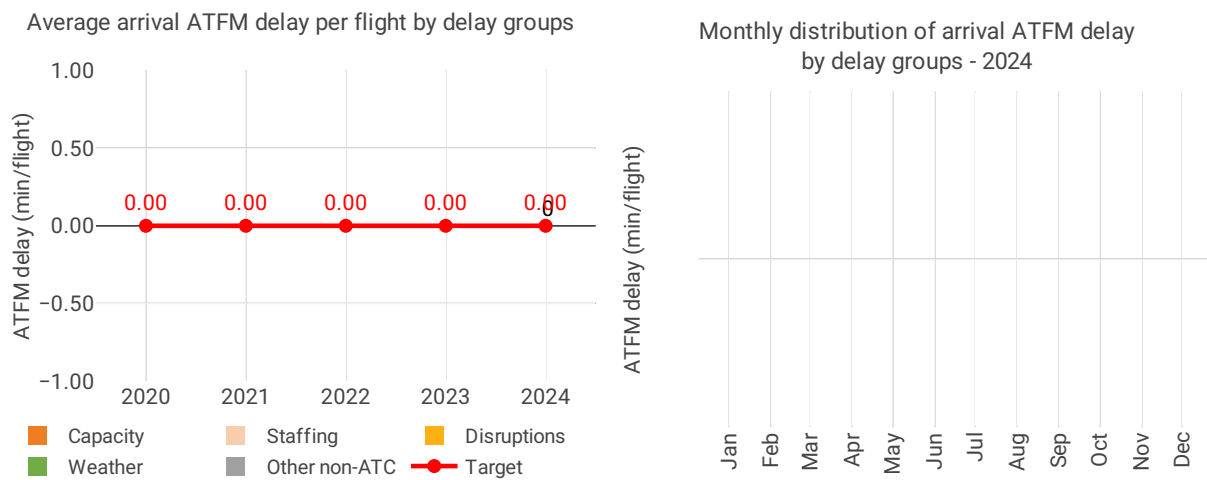


## Focus on ATCOs in operations

In previous years, due to various crises, ATCOs as well as technical personnel were among those affected by staff reductions. Now, as traffic volumes are beginning to rise a bit and in order to be prepared for the possible reopening of airspaces, there is a growing need for additional technical staff whose expertise is essential for implementing technical solutions to enhance the efficiency of ATCOs' work.

### 4.3 Terminal performance

#### 4.3.1 Arrival ATFM delay (KPI#2)



## Focus on arrival ATFM delay

Estonia identified two airports, Tallinn and Tartu, as subject to RP3 monitoring. In accordance with IR (EU) 2019/317 and the traffic figures at these 2 airports, pre-departure delays are not monitored and the capacity performance focuses on arrival ATFM delays and slot adherence. Traffic at these Estonian airports in 2024 was still 11% lower than in 2019, regardless a 15% increase with respect to 2023.

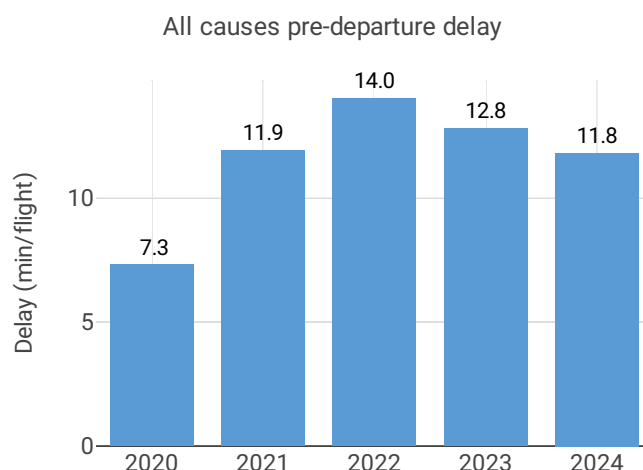
Like in the rest of RP3, no arrival ATFM delays were observed in the entire 2024 at these two airports and slot adherence remained very high (2023: 98.9%; 2024: 99%).

Like in previous years, no arrival ATFM delay was observed at the Estonian airports (Tallinn and Tartu) in 2024. According to the Estonian monitoring report: *Changes in traffic flows/patterns around airports due to Ukrainian war and if/how those changes affected terminal capacity performance: Estonian airspace continues to be impacted by sanctions and the resulting decrease in traffic.*

The Estonian performance plan sets a national target on arrival ATFM delay for all RP3 of 0.0 min/arr. This target, like in the rest of RP3, was met in 2024 with an actual performance of 0.0 min/arr. The Estonian performance plan does not establish any bonus.



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



Airport level										
	Avg arrival ATFM delay (KPI#2)					Slot adherence (PI#1)				
Airport name	2020	2021	2022	2023	2024	2020	2021	2022	2023	2024
Tallin	NA	NA	NA	NA	NA	98.5%	98.2%	98.6%	98.9%	99.0%
Tartu			NA	NA	NA			50.0%	90.9%	98.1%

	ATC pre departure delay (PI#2)					All causes pre departure delay (PI#3)				
Airport name	2020	2021	2022	2023	2024	2020	2021	2022	2023	2024
Tallin	0.01	0.02	0.11	0.09	0.08	7.3	11.9	14.0	12.8	11.8
Tartu			NA	NA	NA			NA	NA	NA

## Focus on performance indicators at airport level

### ATFM slot adherence

Tallin showed very high slot adherence (99%) and at Tartu there only 52 regulated departures in 2023, from which only 1 departed outside of the STW. The national average was 99%. With regard to the 1% of flights that did not adhere, 0.3% were early and 0.7% were late.

### ATC pre-departure delay

This indicator is not monitored for airports below 80 000 IFR movements annual average during the 2016-2018 period, so it is not monitored for any airport in Estonia.

### All causes pre-departure delay

This indicator is not monitored for airports below 80 000 IFR movements annual average during the 2016-2018 period, so it is not monitored for any airport in Estonia.



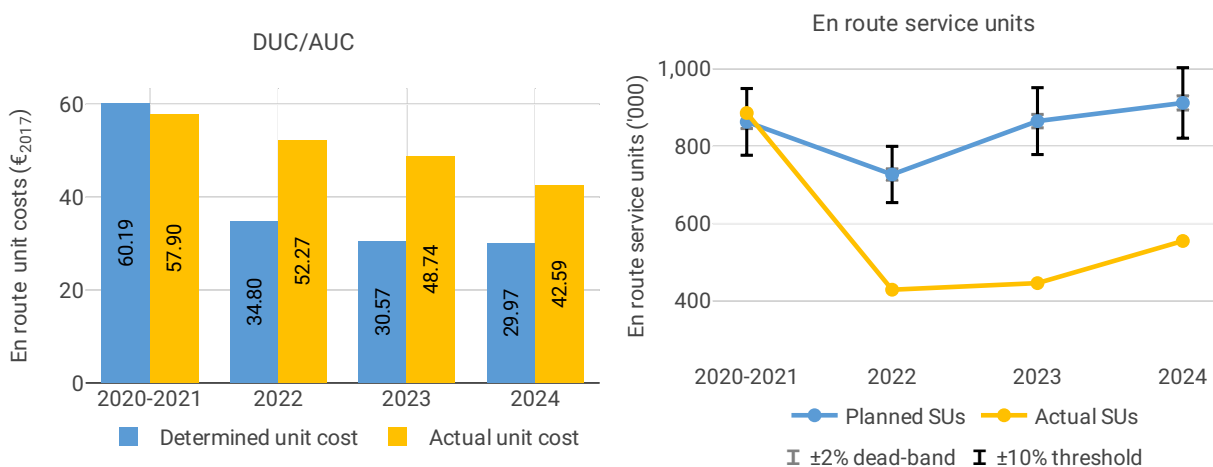
## 5 COST-EFFICIENCY - ESTONIA

### 5.1 PRB monitoring

- The en route 2024 actual unit cost of Estonia was 42.59€2017, +42% higher than the determined unit cost (29.97€2017). The terminal 2024 actual unit cost was 169.01€2017, +38% higher than the determined unit cost (122.71€2017).
- The en route 2024 actual service units (0.6M) were -39% lower than the determined service units (0.9M) mainly due to shifted traffic flows caused by Russia's war of aggression against Ukraine.
- The en route 2024 actual total costs were -3.7M€2017 (-14%) lower than determined, with all cost categories registering lower-than-planned costs. The difference is mainly due to lower staff costs (-2.5M€2017, or -21%) for EANS. However, in nominal terms, the actual staff costs show an increase of +2.4% compared to the determined figures.
- EANS costs of investments were 4.9M€2017 in 2024 for both en route and terminal charging zones, -9.7% less than determined (5.4M€2017). According to the NSA, this reduction is due a decrease in depreciation costs following the postponement of new investments.
- The en route actual unit cost incurred by users in 2024 was 60.57€ (+87% above the 2024 DUC), while the terminal actual unit cost incurred by users was 130.40€ (-2.1% below the 2024 DUC). The difference between the AUCU and the DUC for the en route charging zone is primarily attributed to lower than planned service units.
- The en route regulatory result for EANS amounted to +4.9M€, or 19% of the 2024 revenue.
- Estonia should ensure that any excessive regulatory result, including excess funds received by the ANSP due to the inflation mechanism, is either reinvested to improve the quality of services delivered to airspace users or reimbursed to them.

### 5.2 En route charging zone

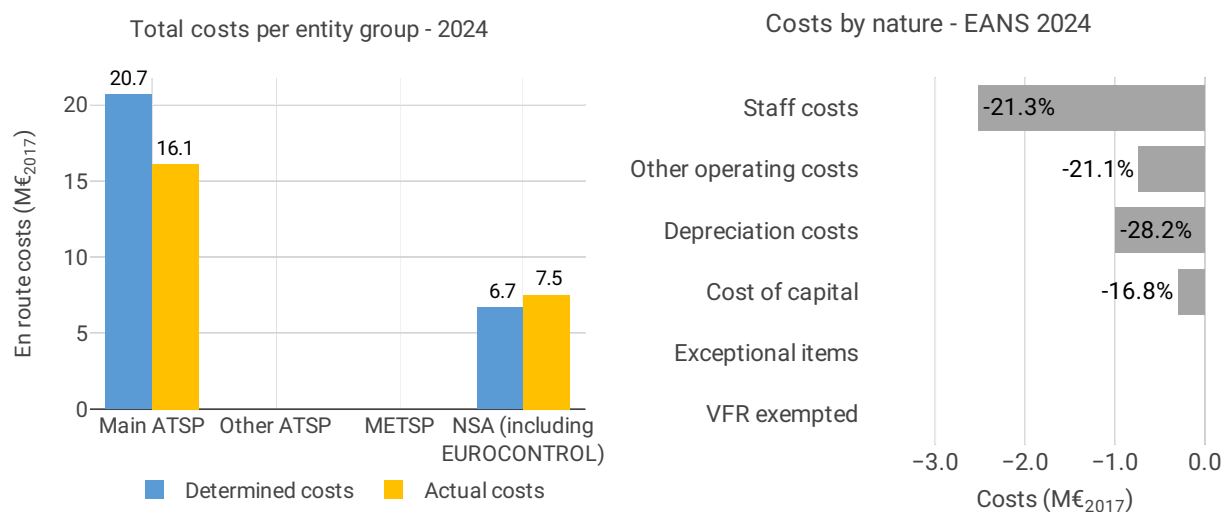
#### 5.2.1 Unit cost (KPI#1)



Actual and determined data				
Total costs - nominal (M€)	2020-2021	2022	2023	2024
Actual costs	53	26	27	30
Determined costs	54	27	28	30
Difference costs	0	-1	-2	0

Inflation assumptions	2020-2021	2022	2023	2024
Determined inflation rate	NA	2.5%	2.1%	1.9%
Determined inflation index	NA	110.4	112.7	114.8
Actual inflation rate	NA	19.4%	9.1%	3.7%
Actual inflation index	NA	132	144	149.3
Difference inflation index (p.p.)	NA	+21.6	+31.3	+34.5



## Focus on unit cost

### AUC vs. DUC

In 2024, the en route AUC was +42.1% (or +12.62 €2017) higher than the planned DUC. This results from the combination of significantly lower than planned TSUs (-39.2%) and significantly lower than planned en route costs in real terms (-13.5%, or -3.7 M€2017). It should be noted that the actual inflation index in 2024 was +34.5 p.p. higher than planned.

### En route service units

The difference between actual and planned TSUs (-39.2%) 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 -13.5% (-3.7 M€2017) lower than planned. This is the result of lower costs for the main ANSP, EANS (-22.0%, or -4.6 M€2017) and higher costs for the NSA/EUROCONTROL (+12.8%, or +0.9 M€2017).



**En route costs for the main ANSP at charging zone level**

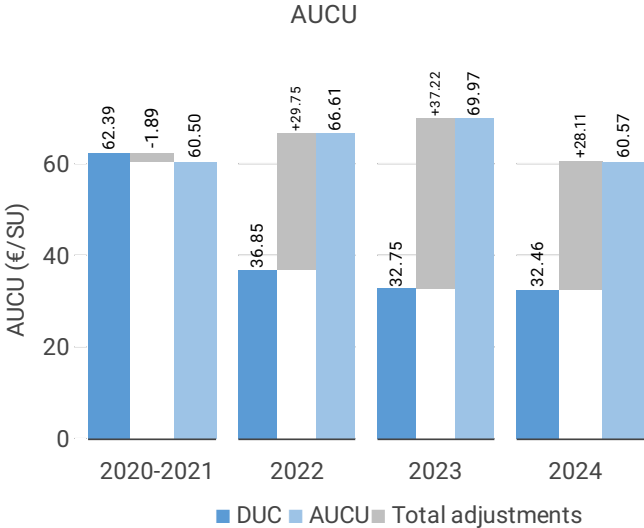
Significantly lower than planned en route costs in real terms for EANS in 2024 (-22.0%, or -4.6 M€2017) result from:

- Significantly lower staff costs (-21.3%) in real terms due to the impact of higher than planned inflation index (+34.5 p.p.) since, in nominal terms, staff costs were above the plan (+2.4%),
- Significantly lower other operating costs (-21.1%) also reflecting the impact of inflation index as nominal costs slightly exceeded planned figures (+2.6%),
- Significantly lower depreciation (-28.2%) resulting from “unforeseen changes in actual investment costs of new investments due to a delayed/postponed implementation”,
- Significantly lower cost of capital (-16.8%) reflecting changes in the financing structure resulting in the share of financing through equity being much lower than planned.

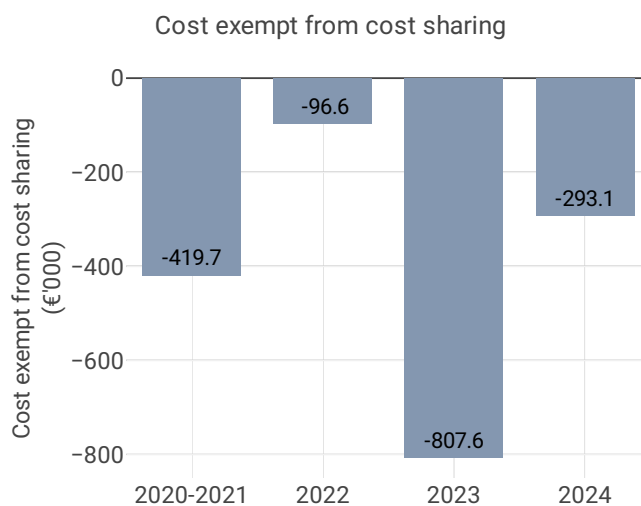
**RP3 summary**

When considering the whole of RP3 (2020-2024) for Estonia en route charging zone, actual TSUs are -31.2% lower than planned, while actual costs in real terms are -9.1% lower than the determined costs (some -12.0 M€2017). As a result, the weighted average actual unit cost over RP3 (51.42 €2017) is +32.1% higher than planned in the PP (38.91 €2017).

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



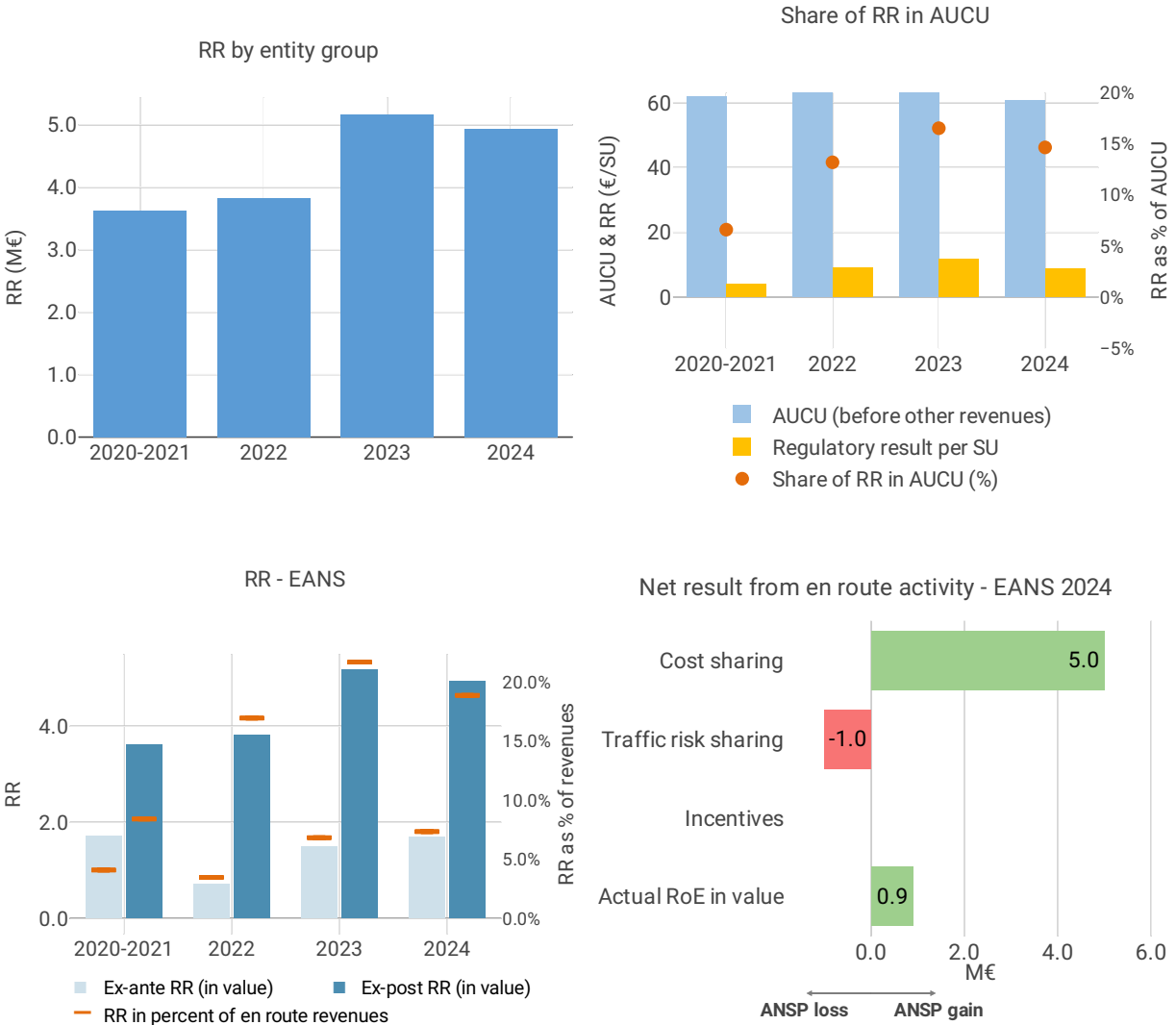
AUCU components (€/SU) – 2024	
<b>Components of the AUCU in 2024</b>	<b>€/SU</b>
<b>DUC</b>	<b>32.46</b>
Inflation adjustment	9.54
Cost exempt from cost-sharing	-0.53
Traffic risk sharing adjustment	14.21
Traffic adj. (costs not TRS)	4.89
Financial incentives	0.00
Modulation of charges	0.00
Cross-financing	0.00
Other revenues	0.00
Application of lower unit rate	0.00
Total adjustments	28.11
<b>AUCU</b>	<b>60.57</b>
<b>AUCU vs. DUC</b>	<b>+ 86.6%</b>



Cost exempt from cost sharing – 2024		
<b>Cost exempt from cost sharing by item - 2024</b>	<b>€'000</b>	<b>€/SU</b>
New and existing investments	-1,144.0	-2.06
Competent authorities and qualified entities costs	1,073.6	1.93
Eurocontrol costs	-222.7	-0.40
Pension costs	0.0	0.00
Interest on loans	0.0	0.00
Changes in law	0.0	0.00
<b>Total cost exempt from cost risk sharing</b>	<b>-293.1</b>	<b>-0.53</b>



5.2.3 Regulatory result (RR)



**Focus on regulatory result**

**EANS net gain/loss on activity in the Estonia en route charging zone in the year 2024**

EANS reported a net gain of +4.0 M€, as a combination of a gain of +5.0 M€ arising from the cost sharing mechanism, with a loss of -1.0 M€ arising from the traffic risk sharing mechanism.

**EANS overall regulatory result (RR) for the en route activity**

Ex-post, the overall RR taking into account the net gain from the en route activity mentioned above (+4.0 M€) and the actual RoE (+0.9 M€) amounts to +4.9 M€ (18.9% of the en route revenues). The resulting ex-post rate of return on equity is 39.4%, which is higher than the 7.3% planned in the PP.

**RP3 summary**

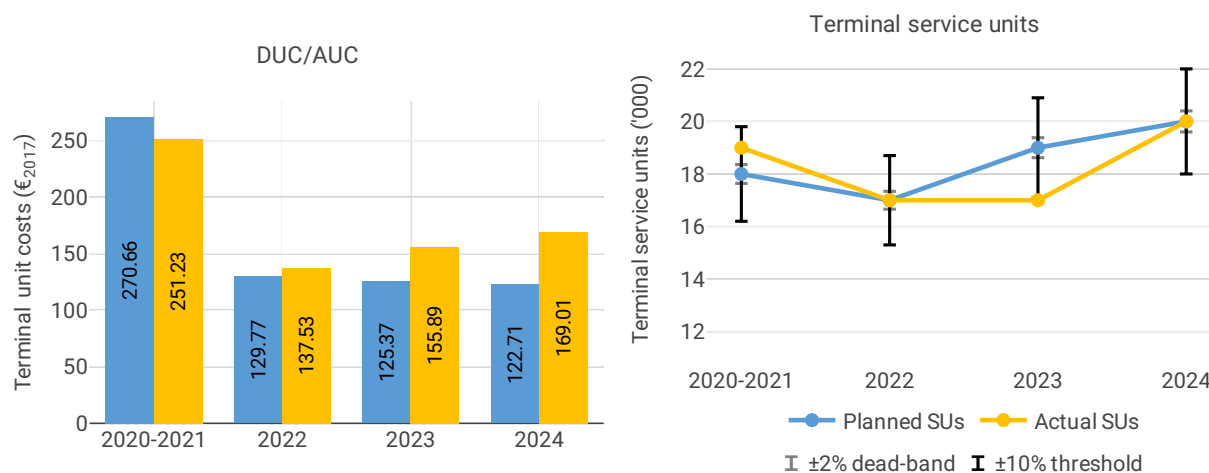
When considering the whole of RP3 (2020-2024), EANS generated a cumulative gain in respect of cost sharing of +14.5 M€, as actual total costs for RP3 were lower than planned. The traffic risk sharing mechanism generated loss of -1.9 M€. Adding the actual RoE (+4.9 M€



over RP3) leads to an overall regulatory result of +17.5 M€, which corresponds to an average ex-post return on equity of 25.9% (compared to 7.3% initially planned in the PP).

### 5.3 Terminal charging zone

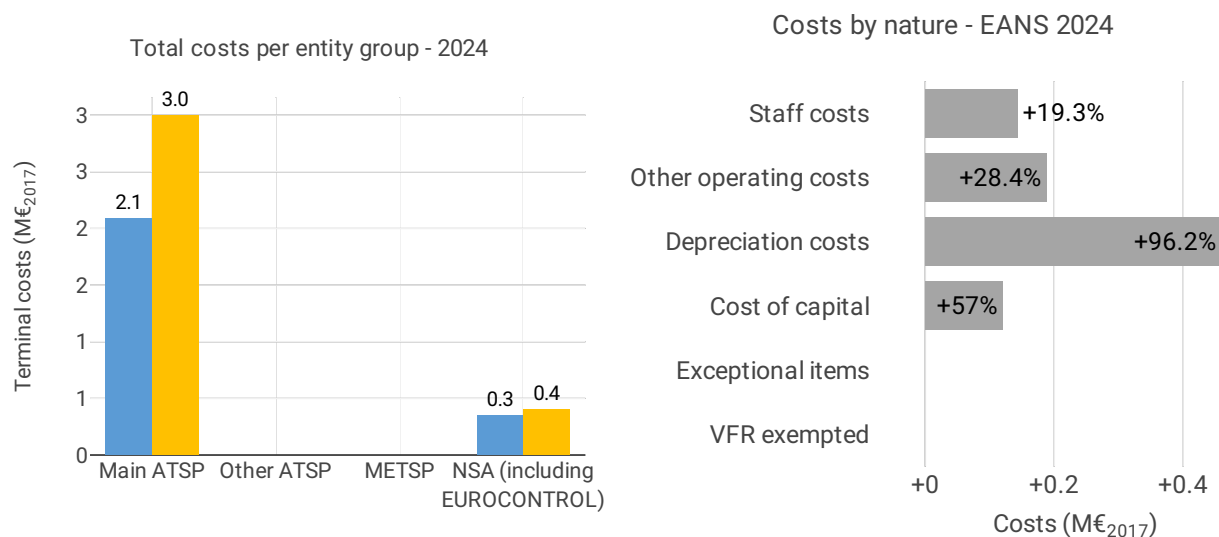
#### 5.3.1 Unit cost (KPI#1)



#### Actual and determined data

Total costs - nominal (M€)	2020-2021	2022	2023	2024
Actual costs	5	3	3	4
Determined costs	5	2	3	3
Difference costs	0	0	1	2

Inflation assumptions	2020-2021	2022	2023	2024
Determined inflation rate	NA	2.5%	2.1%	1.9%
Determined inflation index	NA	110.4	112.7	114.8
Actual inflation rate	NA	19.4%	9.1%	3.7%
Actual inflation index	NA	132	144	149.3
Difference inflation index (p.p.)	NA	+21.6	+31.3	+34.5



## Focus on unit cost

### AUC vs. DUC

In 2024, the terminal AUC was +37.7% (or +46.30 €2017) higher than the planned DUC. This results from the combination of significantly higher than planned terminal costs in real terms (+39.4%, or +1.0 M€2017) and higher than planned TNSUs (+1.2%). It should be noted that the actual inflation index in 2024 was +34.5 p.p. higher than planned.

### Terminal service units

The difference between actual and planned TNSUs (+1.2%) falls inside the  $\pm 2\%$  dead-band. Hence, the gain of additional terminal revenues is kept by the ANSPs (see items 10 to 14).

### Terminal costs by entity

Actual real terminal costs are +39.4% (+1.0 M€2017) higher than planned. This is the result of higher costs for the main ANSP, EANS (+43.6%, or +0.9 M€2017) and the NSA (+14.6%, 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 EANS in 2024 (+43.6%, or +0.9 M€2017) result from:

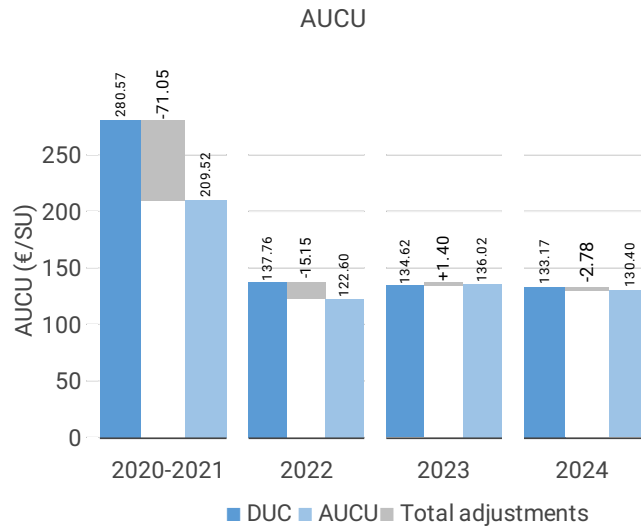
- Significantly higher staff costs (+19.3%), which, based on the information provided by Estonia, is due to the fact that a *“higher proportion of actual costs was allocated to terminal costs”* due to significantly lower en route traffic.
- Significantly higher other operating costs (+28.4%), which, as already detailed above, is also explained by the changes in the allocation of actual costs.
- Significantly higher depreciation (+96.2%), reflecting continuation of the investment programme, including projects which had been postponed in previous years.
- Significantly higher cost of capital (+57.0%) reflecting a combination of higher than planned interest rate on debt and a much lower proportion of financing through equity.

### RP3 summary

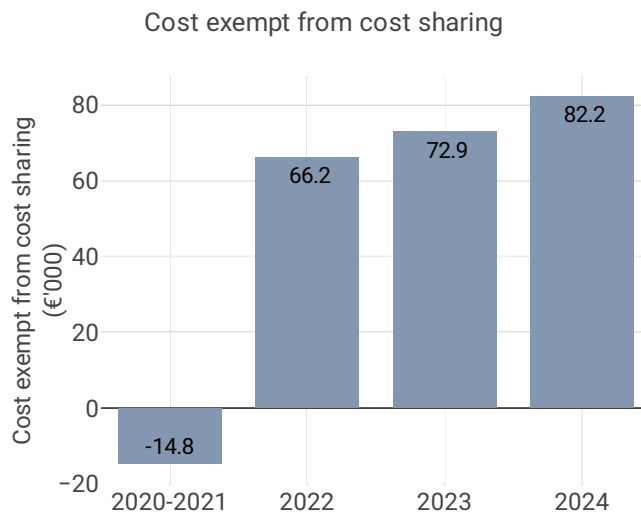
When considering the whole of RP3 (2020-2024) for Estonia terminal charging zone, actual TNSUs are -0.3% lower than planned, while actual costs in real terms are +11.2% higher than the determined costs (some +1.3 M€2017). As a result, the weighted average actual unit cost over RP3 (179.86 €2017) is +11.5% higher than planned in the PP (161.27 €2017).



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

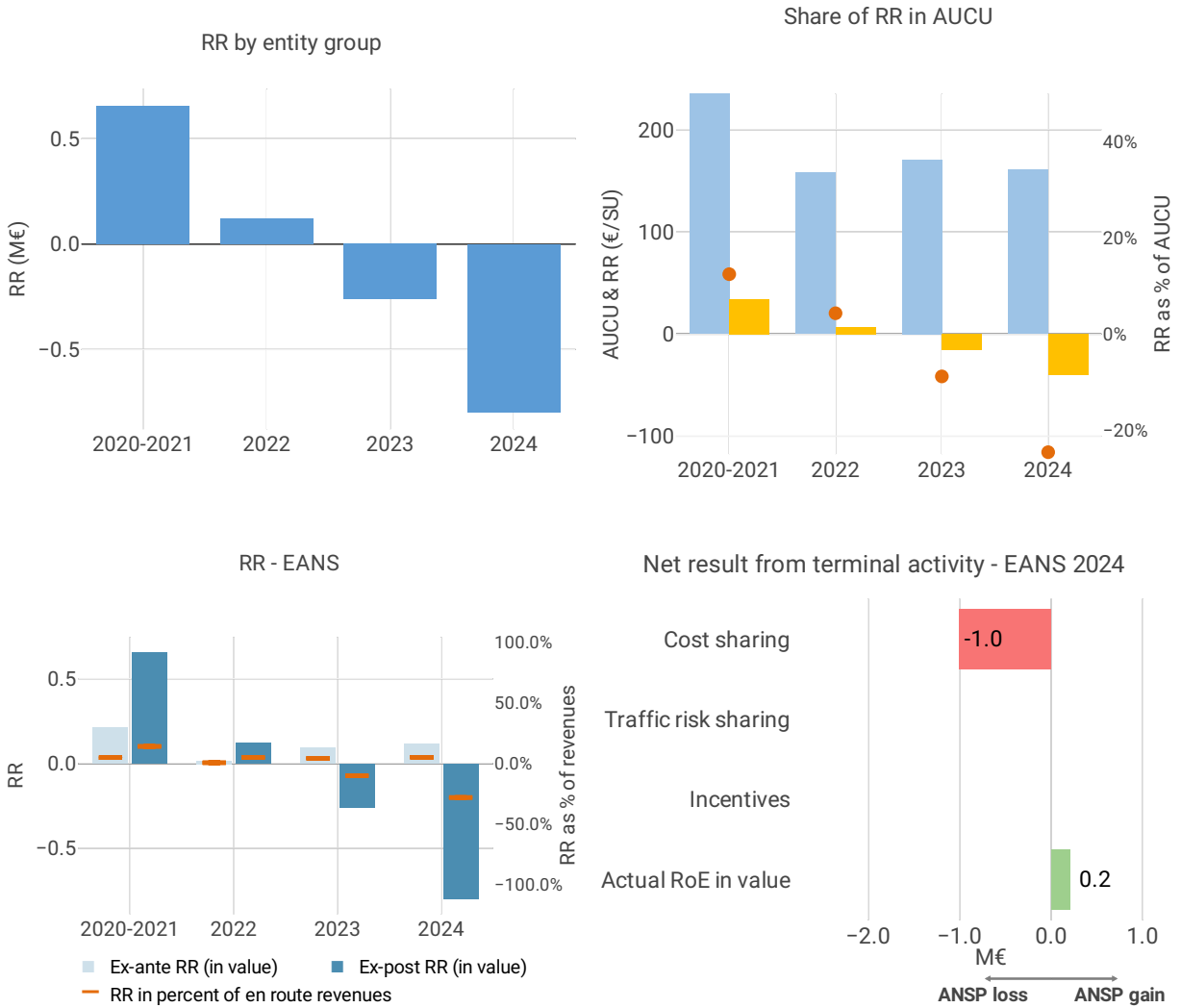


AUCU components (€/SU) - 2024	
<b>Components of the AUCU in 2024</b>	<b>€/SU</b>
<b>DUC</b>	<b>133.17</b>
Inflation adjustment	24.03
Cost exempt from cost-sharing	4.09
Traffic risk sharing adjustment	0.00
Traffic adj. (costs not TRS)	-0.33
Financial incentives	0.00
Modulation of charges	0.00
Cross-financing	0.00
Other revenues	-30.56
Application of lower unit rate	0.00
Total adjustments	-2.78
<b>AUCU</b>	<b>130.40</b>
<b>AUCU vs. DUC</b>	<b>-2.1%</b>



Cost exempt from cost sharing – 2024		
Cost exempt from cost sharing by item - 2024	€'000	€/SU
New and existing investments	31.1	1.55
Competent authorities and qualified entities costs	51.1	2.54
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
<b>Total cost exempt from cost risk sharing</b>	<b>82.2</b>	<b>4.09</b>

5.3.3 Regulatory result (RR)



**Focus on regulatory result**

**EANS net gain/loss on activity in the Estonia terminal charging zone in the year 2024**

EANS reported a net loss of -1.0 M€, as a combination of a loss of -1.0 M€ arising from the cost sharing mechanism, with a gain of +0.03 M€ arising from the traffic risk sharing mechanism.



**EANS 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 (-1.0 M€) and the actual RoE (+0.2 M€) amounts to -0.8 M€ (-28.1% of the terminal revenues). The resulting ex-post rate of return on equity is -26.5%, which is lower than the 7.3% planned in the PP.

**RP3 summary**

When considering the whole of RP3 (2020-2024), EANS generated a cumulative loss in respect of cost sharing of -1.3 M€, as actual total costs for RP3 were higher than planned. The traffic risk sharing mechanism generated gain of +0.1 M€. Adding the actual RoE (+0.9 M€ over RP3) leads to an overall regulatory result of -0.3 M€, which corresponds to an average ex-post return on equity of -2.2% (compared to 7.3% initially planned in the PP).

