PERFORMANCE REVIEW BOARD
of the Single European Sky

Performance Review Board
Monitoring Report
Denmark - 2025

Performance Review Board of the Single European Sky | Rue de Mot 28, 1040 Etterbeek
MOVE-PRB-SECRETARIAT@ec.europa.eu | eu-single-sky.transport.ec.europa.eu

Contents

1 OVERVIEW

1.1 Contextual information

This document is based on the version of the Annual Monitoring Report file submitted by the state on 2026-06-24 (`DK12439_Denmark AMR 2025 updated 2306 2026.xlsx`) and the accompanying submission of en route and terminal (if applicable) reporting tables.

National performance plan adopted following Commission Decision (EU) 2025/1064 of 23 April 2026

List of ACCs 1
Copenhagen ACC

No of airports in the scope of the performance plan:
- **≥80'K** 1
- **<80'K** 0

Exchange rate (1 EUR=)
2022: 7.43733 DKK
2025: 7.46183 DKK

Share of Union-wide:
- **traffic (TSUs) 2025** 1.1%
- **en route costs 2025** 1.6%

Share en route / terminal costs 2025 80% / 20%

En route charging zone(s)
Denmark

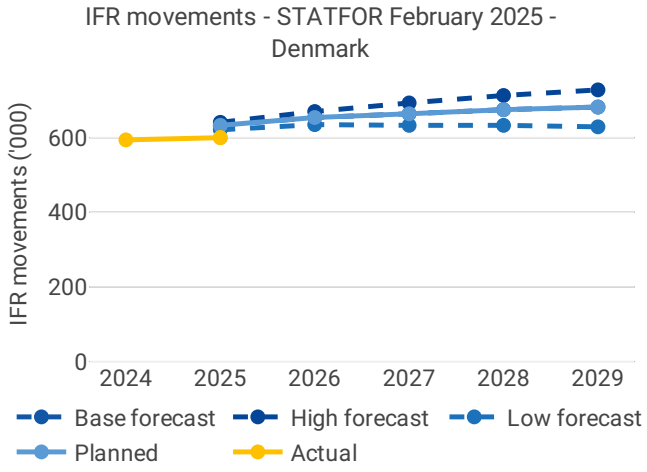
Terminal charging zone(s)
Denmark

Main ANSP
- NAVIAIR

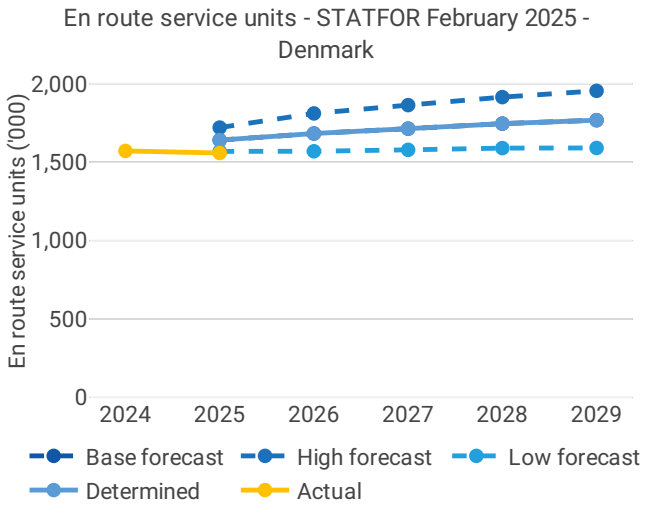
Other ANSPs
–

MET Providers
- DMI

1.2 Traffic (En route traffic zone)

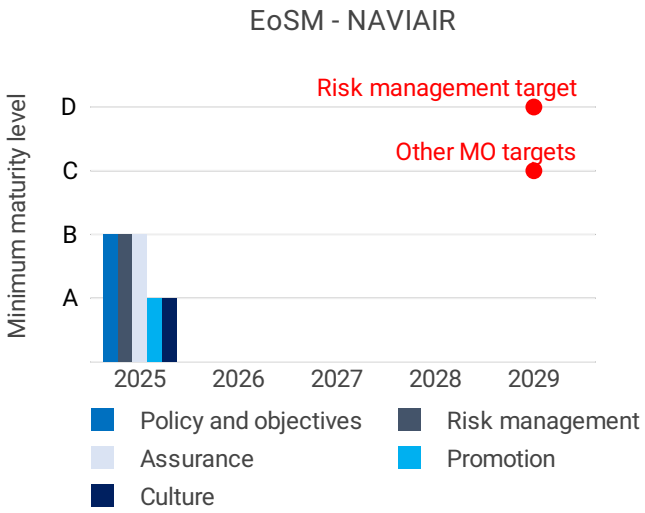


- Denmark recorded 600K actual IFR movements in 2025, +1.1% compared to 2024 (594K).
- Actual 2025 IFR movements were -5.2% below the plan (633K).
- Actual 2025 IFR movements were -10.3% below the actual 2019 level (669K).



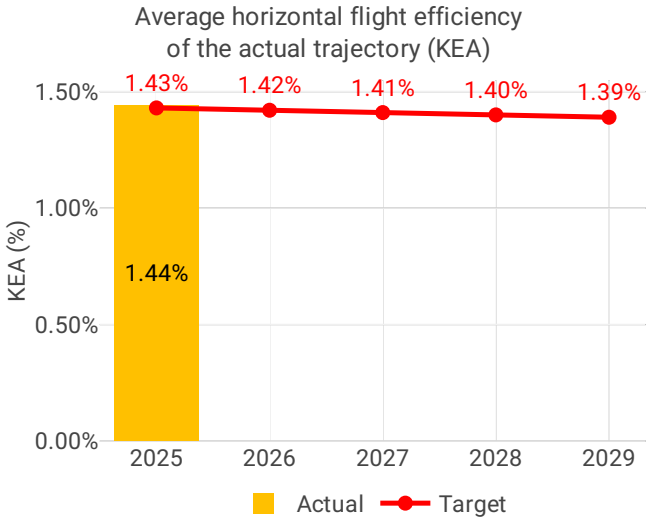
- Denmark recorded 1,558K actual service units in 2025, -0.8% compared to 2024 (1,571K).
- Actual 2025 service units were -5.0% below the plan (1,640K).
- Actual 2025 service units are -12.5% below the actual 2019 level (1,781K).

1.3 Safety (Main ANSP)



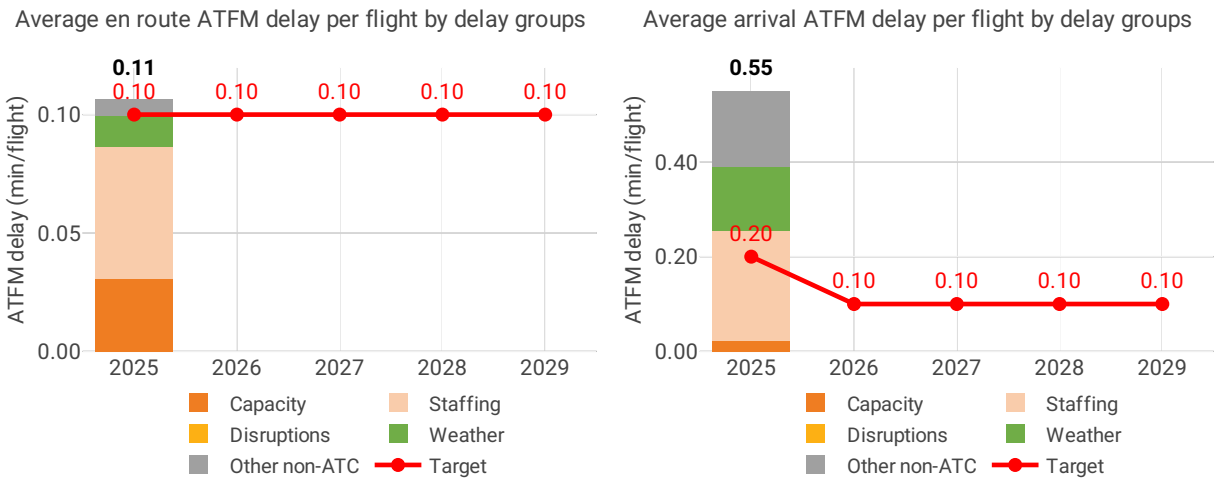
- In 2025, NAVIAIR did not achieve the planned levels set out in its performance plan for three out of five components of the EoSM. The components where NAVIAIR missed the planned levels were Safety Risk Management, Safety Promotion and Safety Culture. Moreover, NAVIAIR scored A on the last 2 components.
- Denmark reported 0 runway incursions (RI) during 2025. The situation remains stable from 2024, as Denmark reported 0 RIs also in 2024. Denmark is significantly below the Union-wide average.
- The rate of separation minima infringements (SMIs) at State level was 0.48 and equal to the rate of SMIs at ANSP level. Both indicators were significantly below the Union-wide average. When comparing to 2024, the rate of separation minima infringements has decreased at both State level and at ANSP level.

1.4 Environment (Member State)



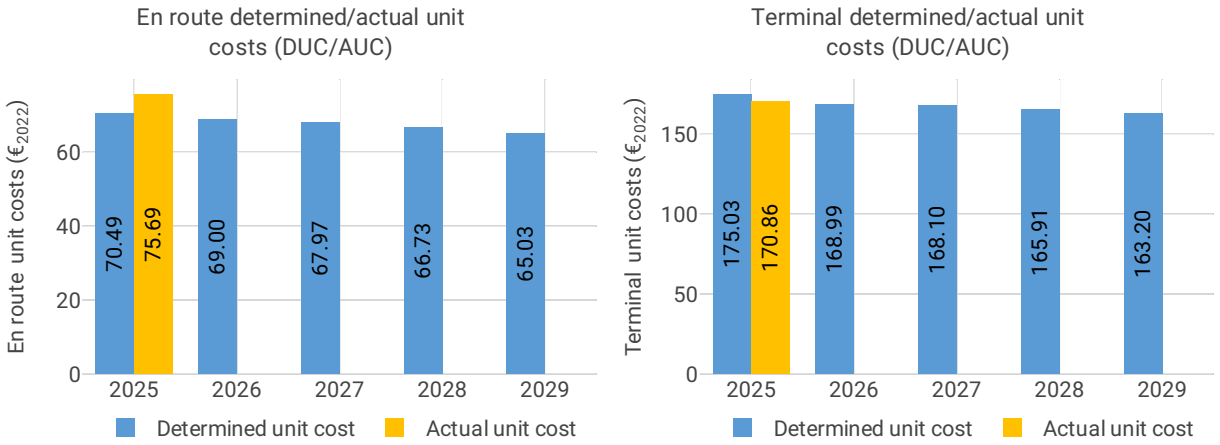
- Denmark registered a KEA performance of 1.44% compared to its target of 1.43%. The target was nearly achieved despite KEA deteriorating from 1.24% in 2024. The NSA states the main reason for not meeting the target is linked to the fact that new military training areas were implemented and the unstable situation across the European network.
- Both KEP and KES deteriorated compared to 2024. The decline indicates that Denmark's environmental efficiency has worsened.
- VFE of the actual trajectory was at 78.23%, which was better than the Union-wide average.
- The average time in level flight during descent degraded, and during climb improved marginally compared to 2024.
- Additional taxi-out time was 3.36 min/flight which degraded marginally compared to 2024, and additional taxi-in time was 1.46 min/flight and improved compared to 2024.
- Additional time in the arrival sequencing and metering area degraded to 2.58 min/flight.

1.5 Capacity (Member State)



- Denmark registered 0.11 minutes of average en route ATFM delay per flight during 2025, which remained 0.11 after the post-ops adjustment process, thus not achieving the local target value of 0.10. Delays in Denmark increased by 0.06 minutes per flight year-on-year.
- Delays were highest in September, mostly driven by ATC staffing.
- The share of delayed flights with delays longer than 15 minutes in Denmark decreased by -14 percentage points compared to 2024.
- The number of ATCOs in OPS was 83 being below the 2025 plan in Copenhagen ACC by -4 FTE.
- The yearly total of sector opening hours in Copenhagen ACC was 49,777, showing a 10% increase compared to 2024.
- Copenhagen ACC registered 10.35 IFR movements per sector opening hour in 2025, -9% below the level recorded in 2024.
- Denmark registered an average airport arrival ATFM delay of 0.55 minutes per flight in 2025, thus not achieving the local target of 0.2 minutes. Compared to 2024, average arrival ATFM delays in Denmark were 0.05 minutes per flight higher in 2025.
- The main drivers of delays were ATC staffing, accounting for 0.23 of the total delays, and other non-ATC causes, responsible for 0.16.

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



- The en route 2025 actual unit cost of Denmark was 75.69€2022, +7.4% higher than the determined unit cost (70.49€2022). The terminal 2025 actual unit cost was 170.86€2022, -2.4% lower than the determined unit cost (175.03€2022).
- The en route 2025 actual service units (1.56M) were -5.0% lower than the determined service units (1.64M).
- The en route 2025 actual total costs were +2.3M€2022 (+2.0%) higher than determined. This is mainly due to higher staff costs (+2.5M€2022, or +4.1%) for NAVIAIR, partially compensated by lower other operating costs than planned (-1.2M€2022, or -5.8%). The NSA explained that the increase in staff costs is due to the higher use of extra shifts due to the staffing situation.

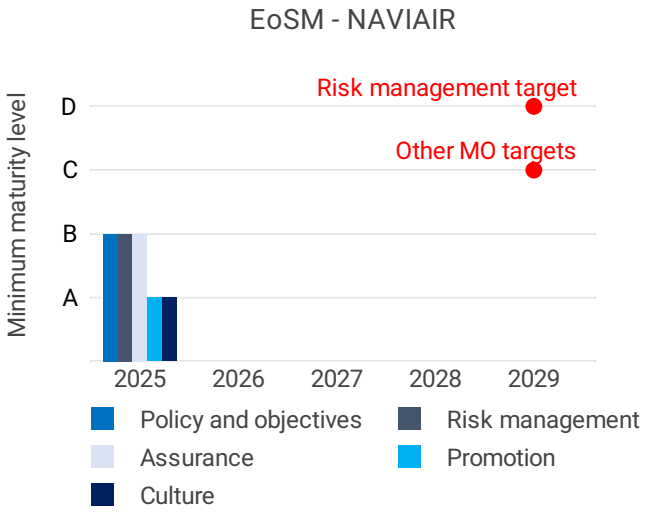
- NAVIAIR spent 19.3M€2022 in 2025 related to costs of investments for both en route and terminal charging zones, +3.6% more than determined (18.6M€2022). According to the NSA, this increase is due to the higher activity level than planned.
- The en route actual unit cost incurred by users in 2025 was 75.67€ (+2.6% above the 2025 DUC), while the terminal actual unit cost incurred by users was 182.85€ (-1.0% below the 2025 DUC). The difference between the AUCU and the DUC for the en route charging zone is mainly driven by the traffic risk sharing adjustment, while for the terminal charging zone it is mainly driven by financial incentives.

2 SAFETY - DENMARK

2.1 PRB monitoring

- In 2025, NAVIAIR did not achieve the planned levels set out in its performance plan for three out of five components of the EoSM. The components where NAVIAIR missed the planned levels were Safety Risk Management, Safety Promotion and Safety Culture. Moreover, NAVIAIR scored A on the last 2 components.
- Denmark reported 0 runway incursions (RI) during 2025. The situation remains stable from 2024, as Denmark reported 0 RIs also in 2024. Denmark is significantly below the Union-wide average.
- The rate of separation minima infringements (SMIs) at State level was 0.48 and equal to the rate of SMIs at ANSP level. Both indicators were significantly below the Union-wide average. When comparing to 2024, the rate of separation minima infringements has decreased at both State level and at ANSP level.

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



Focus on EoSM

In 2025, Naviair did not achieve the planned levels set out in its performance plan for three out of five components of the EoSM. The components where Naviair missed the planned levels were Safety Risk Management, Safety Promotion and Safety Culture.

Denmark assesses the achieved level of actual performance in the monitoring report as follows: Naviair has assessed the maturity level between Level A and Level B across the five Safety Components. The assessment is primarily influenced by the fact that the difference between the requirements at level A and level B is quite large and that Naviair does not currently have all the formalised processes in place.

As described in the monitoring report, Naviair has initiated a project at corporate level to ensure a unified approach across all departments to achieve the safety performance targets by 2029. Furthermore, Naviair has established a plan to address current performance gaps

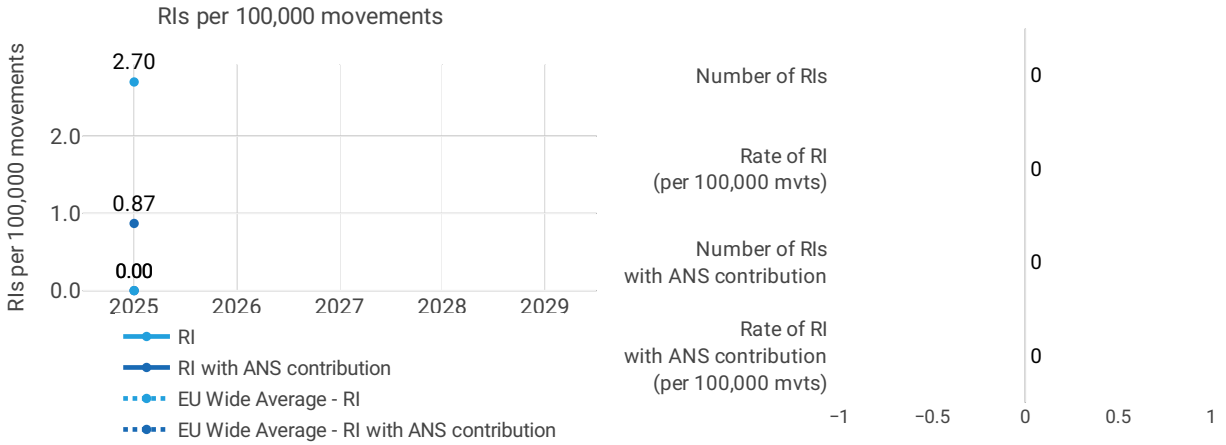
in Safety Culture, Safety Risk Management, and Safety Promotion. The plan includes responsibilities for developing and executing detailed plans, to meet annual sub-goals and the final targets for 2029.

In terms of underlying causes or circumstances leading to levels not being achieved, the monitoring report states that the result is primarily due to the fact that the difference between the requirements at level A and level B is quite large and that Naviair does not currently have all the formalised processes in place.

Furthermore, the monitoring report states that the NSA will monitor and follow up on Naviair's plan for improving the SAF performance during RP4.

2.3 Safety occurrences

2.3.1 Rate of runway incursions (RIs) (PI#1) and Rate of runway incursion with ANS contribution (PI#3)

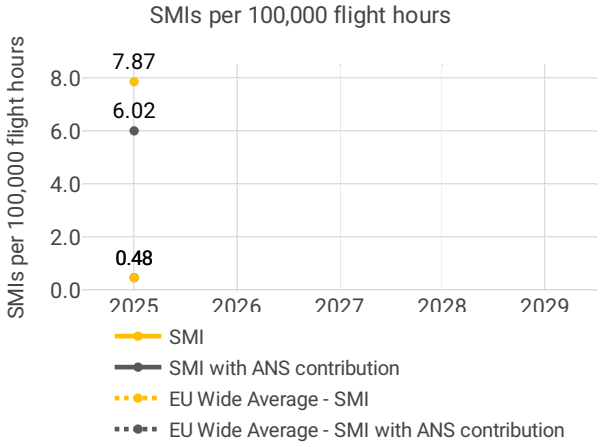


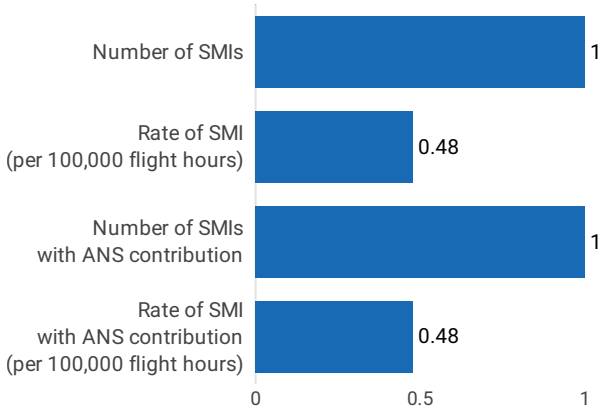
Rate of RIs per 100,000 airport movements - Denmark						
#	Airport name	APT movements	Number of RI	Rate RI per 100,000	Number of RI with ANS contribution	Rate RI per 100,000 with ANS contribution
1	Copenhagen - Kastrup	256,659	0	0.00	0	0.00

Focus on runway incursions

Denmark reported zero runway incursions (RI) during 2025. The situation remains stable from 2024, as Denmark reported 0 RIs also in 2024. Denmark is significantly below the Union-wide average.

2.3.2 Rate of separation minima infringements (SMIs) (PI#2) and Rate of separation minima infringements with ANS contribution (PI#4)





Rate of SMI with ANS contribution per 100,000 flight hours											
		Flight hours					Number of SMIs with ANS contribution				
#	ANSP	2025	2026	2027	2028	2029	2025	2026	2027	2028	2029
1	NAVIAIR	209,318	NA	NA	NA	NA	1	NA	NA	NA	NA

		Rate of SMI with ANS contribution per 100,000 flight hours					% variation in rate of SMIs				
#	ANSP	2025	2026	2027	2028	2029	2025	2026	2027	2028	2029
1	NAVIAIR	0	NA	NA	NA	NA					

Focus on separation minima

At State level, Denmark reported 1 separation minima infringement (SMI) in their airspace during 2025. The rate of separation minima infringements was significantly below Union-wide average (0.48 vs 7.87). At ANSP level, Denmark reported 1 SMI with ANS contribution. The rate of separation minima infringements at ANSP level was significantly below Union-wide average (0.48 vs 6.02).

When comparing to 2024, the rate of separation minima infringements has decreased at both State level (0.48 vs 2.91) and at ANSP level (0.48 vs 2.91).

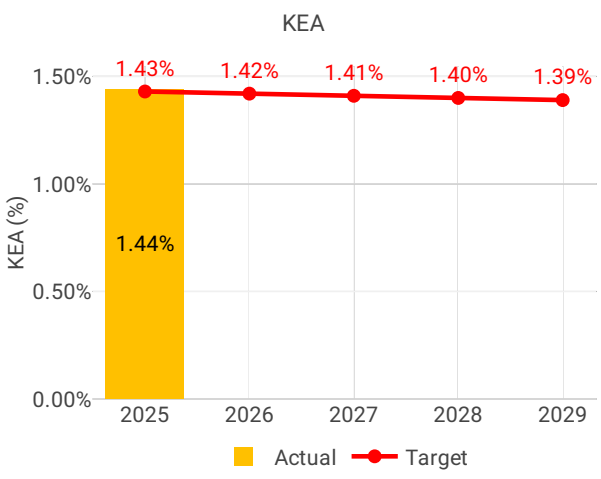
3 ENVIRONMENT - DENMARK

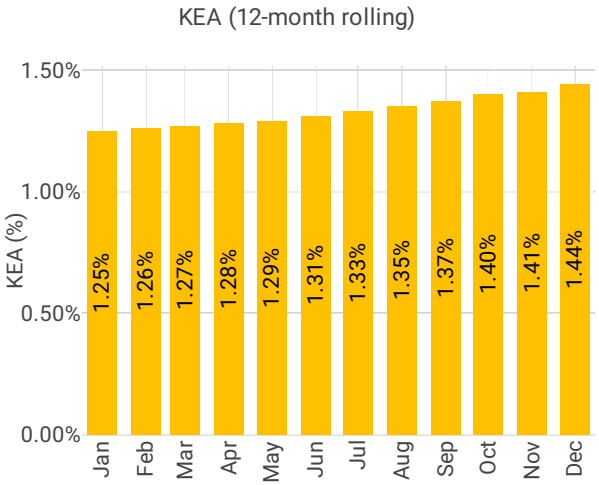
3.1 PRB monitoring

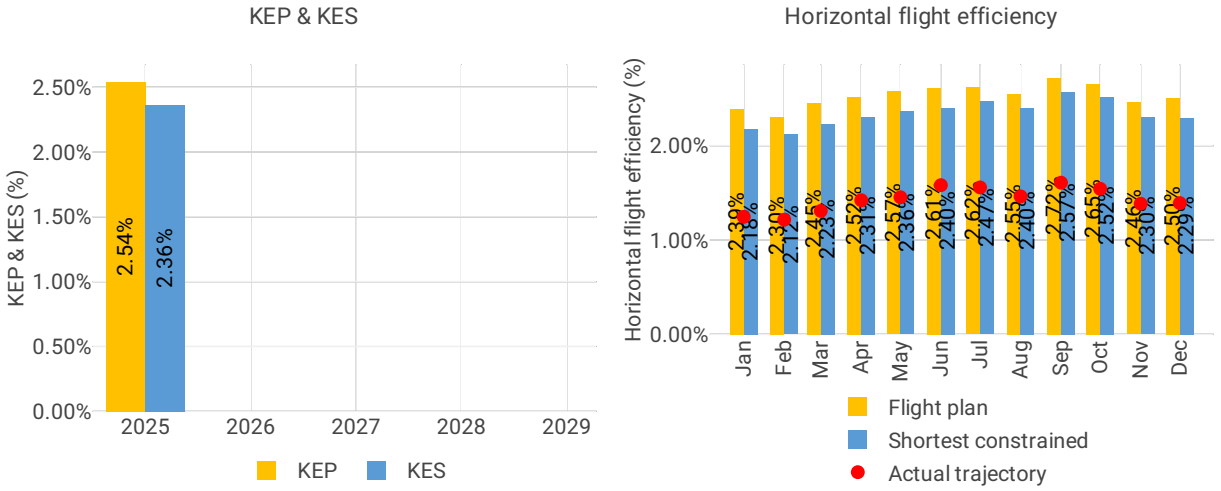
- Denmark registered a KEA performance of 1.44% compared to its target of 1.43%. The target was nearly achieved despite KEA deteriorating from 1.24% in 2024. The NSA states the main reason for not meeting the target is linked to the fact that new military training areas were implemented and the unstable situation across the European network.
- Both KEP and KES deteriorated compared to 2024. The decline indicates that Denmark's environmental efficiency has worsened.
- VFE of the actual trajectory was at 78.23%, which was better than the Union-wide average.
- The average time in level flight during descent degraded, and during climb improved marginally compared to 2024.
- Additional taxi-out time was 3.36 min/flight which degraded marginally compared to 2024, and additional taxi-in time was 1.46 min/flight and improved compared to 2024.
- Additional time in the arrival sequencing and metering area degraded to 2.58 min/flight.

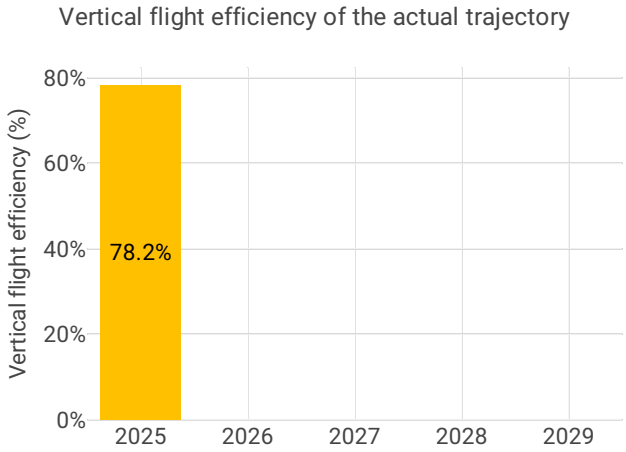
3.2 En route performance

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 (KES) (PI#2) and vertical flight efficiency of the actual trajectory (VFE) (PI#3)









Focus on en route performance

KEA

While the value of the indicator degraded in absolute terms with respect to the previous year (from 1.24% to 1.44% for KEA and from 1.11% to 1.28% for KEA corrected for the influence of the war in Ukraine), those values place Denmark in the two top performers for 2025 (1st for KEA and 2nd for the corrected KEA).

The additional distance for Denmark corresponds to 0.55% of the additional distance in the SES area (3rd contribution).

Regarding the assessment of the achieved level of actual performance in the environment KPA, the NSA reports: *"Naviair has consistently recorded a low value and is in 2025 among the lowest-scoring ANSPs.*

The failure to meet the target in the reporting year should be assessed within a broader operational context.

Flight inefficiency increased accross the European ATM network, as documented in the Perfomance Review Report 2025."

Regarding the implementation of major operational or structural changes during the calendar year impacting performance in this key performance area, the NSA reports: *"F35 military training areas were implemented on 18th of May"*

Regarding progress on the implementation of the measures committed to in the ERNIP, the NSA reports: *"EKDK FIR sector split*

VOR stations closure Denmark - Phase 2

Areas over the High Seas

New TRAs

are all implemented"

Regarding recommendations to the ANSP to rectify the situation, the NSA reports: *"The underperformance was minimal. Underperformance is seen as linked to the fact that new military training areas were implemented and the unstable situation across the European network."*

Regarding the follow up of the remedial measures indicated in the previous monitoring report(s), the NSA reports: *"The PRB in their report"Performance Review Body Advice on the Union-wide targets for RP4 Annex II – Impact of Russia's war of aggression on horizontal flight efficiency" together with Eurocontrol has established that there is an impact of Russia's war og agression on the KEA value of 0,12 pp.*

The overall increase in value can be attributed to the structural change in flows with impact also from staffing and increased military airspace closures due to training"

KEP

Regarding initiatives implemented or planned that will improve this PI and how does the NSA intend on monitoring their effectiveness on performance, the NSA reports: *"Free Route Airspace is implemented in the airspace above FL285"*

KES

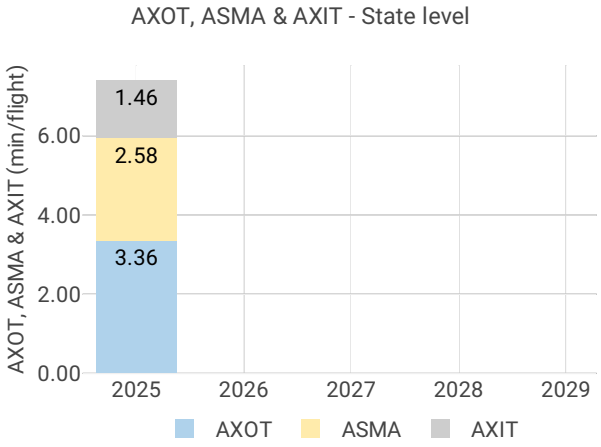
Regarding initiatives implemented or planned that will improve this PI and how does the NSA intend on monitoring their effectiveness on performance, the NSA reports: *"No remarks."*

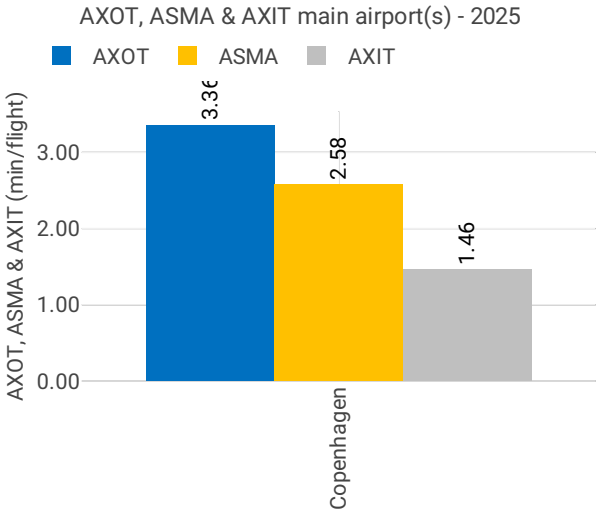
Vertical flight efficiency

Regarding initiatives implemented or planned that will improve this PI and how does the NSA intend on monitoring their effectiveness on performance, the NSA reports: *"No remarks. We will implement the new measures in our internal reporting to enable ongoing follow-up on this."*

3.3 Terminal performance

3.3.1 Additional taxi-out time (AXOT) (PI#4), Additional taxi-in time (AXIT) (PI#5) & Arrival Sequencing and Metering Area (ASMA) time (PI#6)





Airport level															
	Additional taxi-out time (PI#4)					Additional ASMA time (PI#6)					Additional taxi-in time (PI#5)				
Airport	2025	2026	2027	2028	2029	2025	2026	2027	2028	2029	2025	2026	2027	2028	2029
Copenhager	3.36	NA	NA	NA	NA	2.58	NA	NA	NA	NA	1.46	NA	NA	NA	NA

Focus on AXOT, AXIT & ASMA

AXOT

The additional time in 2025 increased to 3.36 min/dep, 4% above the 2024 value – last year of RP3 – of 3.23 min/dep (*using the new methodology*).

The average for RP4 airports subject to monitoring of this indicator across Member States in 2025 was 3.61 min/dep.

Regarding initiatives implemented or planned that will improve this PI and how does the NSA intend on monitoring their effectiveness on performance, the NSA reports: *"No initiatives implemented"*

AXIT

The additional time in 2025 was equal to 1.46 min/arr.

The average for RP4 airports subject to monitoring of this indicator across Member States in 2025 was 1.71 min/arr.

Regarding initiatives implemented or planned that will improve this PI and how does the NSA intend on monitoring their effectiveness on performance, the NSA reports: *"No initiatives implemented"*

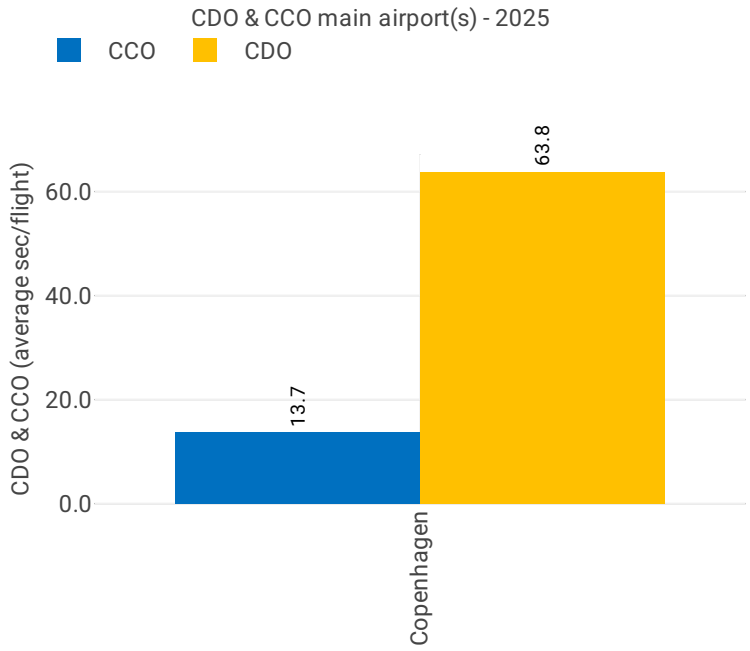
ASMA

The additional time in 2025 increased to 2.58 min/arr, 7% above the 2024 value – last year of RP3 – of 2.41 min/arr (*using the new methodology*).

The average for RP4 airports subject to monitoring of this indicator across Member States in 2025 was 2.98 min/arr.

Regarding initiatives implemented or planned that will improve this PI and how does the NSA intend on monitoring their effectiveness on performance, the NSA reports: *"No initiatives implemented"*

3.3.2 Vertical flight efficiency of the descent (PI#7) and of the climb (PI#8)



Focus on vertical flight efficiency of the descent and of the climb

Vertical flight efficiency of the descent

Compared to the overall RP4 average value (149.2 seconds per flight), the average time flown level during descent is 85.4 seconds per flight lower in Denmark. Copenhagen (EKCH) has an average time flown level of 63.8 seconds per flight during descent.

Regarding initiatives implemented or planned that will improve this PI and how does the NSA intend on monitoring their effectiveness on performance, the NSA reports: *"No remark - being analysed monthly by Naviair"*

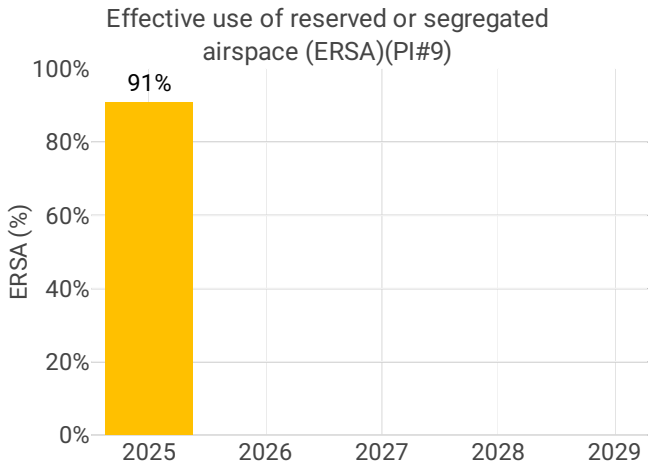
Vertical flight efficiency of the climb

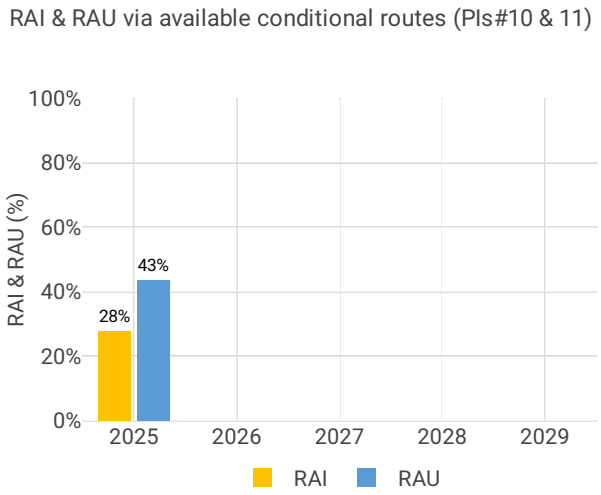
Compared to the overall RP4 average value (34.8 seconds per flight), the average time flown level during climb is 21.1 seconds per flight lower in Denmark. Copenhagen (EKCH) has an average time flown level of 13.7 seconds per flight during climb.

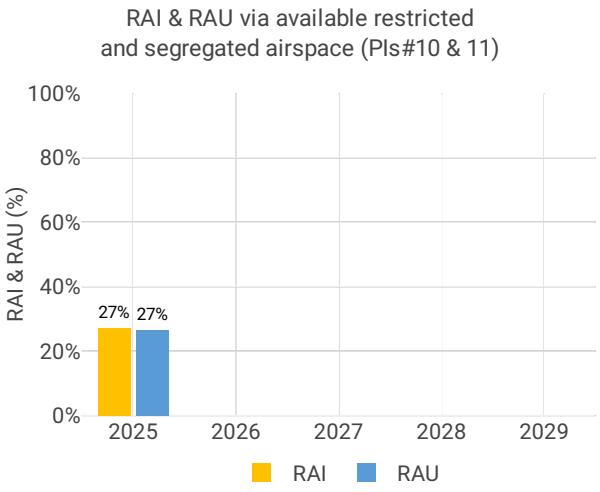
Regarding initiatives implemented or planned that will improve this PI and how does the NSA intend on monitoring their effectiveness on performance, the NSA reports: *"No remark – being analysed monthly by Naviair."*

Airport level										
	Avg. duration in climb (PI#8)					Avg. duration in descent (PI#7)				
Airport	**2025**	**2026**	**2027**	**2028**	**2029**	**2025**	**2026**	**2027**	**2028**	**2029**
Copenhagen	13.7	NA	NA	NA	NA	63.8	NA	NA	NA	NA

3.4 Civil-Military dimension







Focus on Civil-Military dimension

Effective use of reserved or segregated local airspace

DENMARK reports a ratio of **36%**.

- Total number of hours allocated & notified to NM: **1,884**
- Total number of hours used: **676.8**

Regarding initiatives implemented or planned that will improve this PI and how does the NSA intend on monitoring their effectiveness on performance, the NSA reports: *"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."*

Rate of planning via available airspace structures

Comment

DENMARK reports that neither Naviair or NSA have this data available and that they do not have the intention to monitor this at local level. Data used and reported comes from NM.

(Data source NM)

- the ratio of planning via available airspace structures is **27.12%** (via available restricted and segregated airspaces)
- the ratio of planning via available airspace structures is **27.75%** (via available conditional routes)

Regarding initiatives implemented or planned that will improve this PI and how does the NSA intend on monitoring their effectiveness on performance, the NSA reports: *"Based on figures from https://www.sesperformance.eu/dataportal - no breakdown available.*

Neither Naviair 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."

Rate of using available airspace structures

Comment

DENMARK reports that neither Naviair or NSA have this data available and that they do not have the intention to monitor this at local level. Data used and reported comes from NM.

(Data source NM)

- the ratio of the used of the available airspace structures is **26.62%** (via available restricted and segregated airspaces)
- the ratio of the use of the available airspace structures is **43.49%** (via available conditional routes)

Regarding initiatives implemented or planned that will improve this PI and how does the NSA intend on monitoring their effectiveness on performance, the NSA reports: *"Based on figures from https://www.sesperformance.eu/dataportal - no breakdown available.*

Neither Naviair 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."

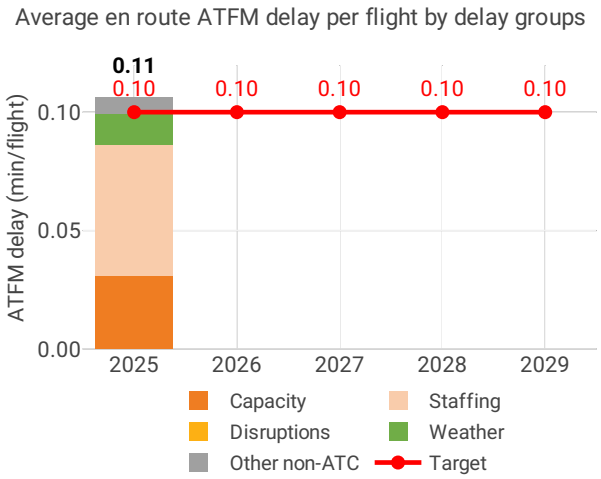
4 CAPACITY - DENMARK

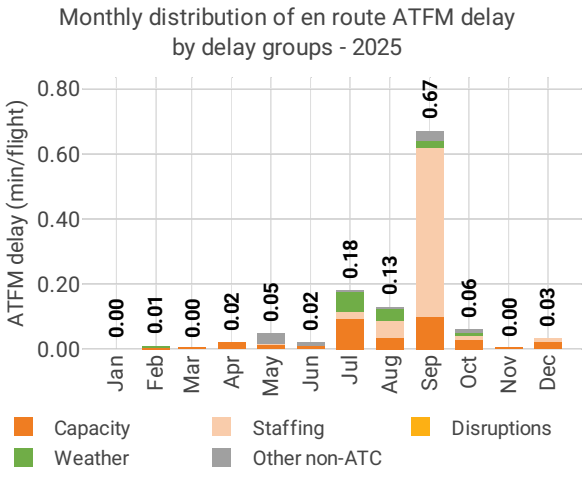
4.1 PRB monitoring

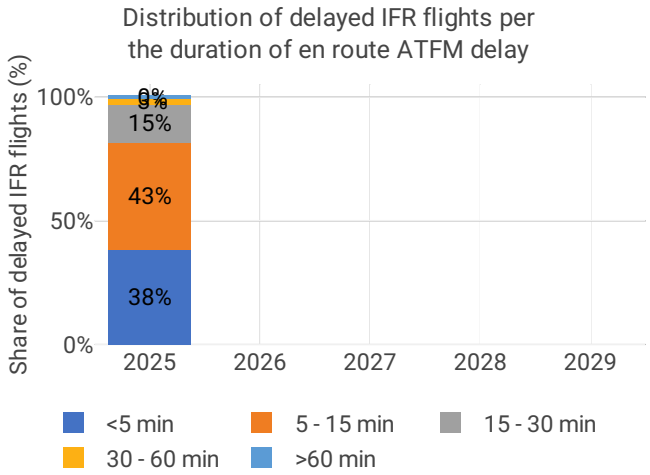
- Denmark registered 0.11 minutes of average en route ATFM delay per flight during 2025, which remained 0.11 after the post-ops adjustment process, thus not achieving the local target value of 0.10. Delays in Denmark increased by 0.06 minutes per flight year-on-year.
- Delays were highest in September, mostly driven by ATC staffing.
- The share of delayed flights with delays longer than 15 minutes in Denmark decreased by -14 percentage points compared to 2024.
- The number of ATCOs in OPS was 83 being below the 2025 plan in Copenhagen ACC by -4 FTE.
- The yearly total of sector opening hours in Copenhagen ACC was 49,777, showing a 10% increase compared to 2024.
- Copenhagen ACC registered 10.35 IFR movements per sector opening hour in 2025, -9% below the level recorded in 2024.
- Denmark registered an average airport arrival ATFM delay of 0.55 minutes per flight in 2025, thus not achieving the local target of 0.2 minutes. Compared to 2024, average arrival ATFM delays in Denmark were 0.05 minutes per flight higher in 2025.
- The main drivers of delays were ATC staffing, accounting for 0.23 of the total delays, and other non-ATC causes, responsible for 0.16.

4.2 En route performance

4.2.1 En route ATFM delay (KPI#1)







Focus on en route ATFM delay

En route ATFM delay

- Denmark had 600k flights in 2025, up from 594k flights in 2024.
- Naviair applied en route ATFM regulations resulting in 66k minutes of delay, an increase from the 28k minutes in 2024.
- Under the auspices of the Route Network (RN) Scenarios during Capacity & Weather Based Operations between June and September 2025, <1k minutes of delay originating in Denmark were re-attributed to other ANSPs.
- When the above post-operations re-attribution is factored in, the total en route delay for Naviair in 2025 was 65k minutes in 2025.

Regarding the reasons and circumstances resulting in the achieved level of actual performance of the en route ATFM delay per flight KPI, the NSA reports: *"The average delay was 0.11 minutes per flight in 2025, below the reference value set in the RP4-planning (0.17).*

52% of the delays were due to the reason ATC Staffing, 29% due to ATC Capacity, 13% due to the reason Weather and 6% due to the reason Airspace Management.

Post summer 57% of the total yearly delay can be attributed to September 2025 were there were ATFM-regulations mainly due to ATC Staffing and ATC Capacity. This is the main contributing factor relating to not reaching the target."

Regarding the description of the adjustments to the capacity plan included in adopted performance plan, the NSA reports: *"None"*

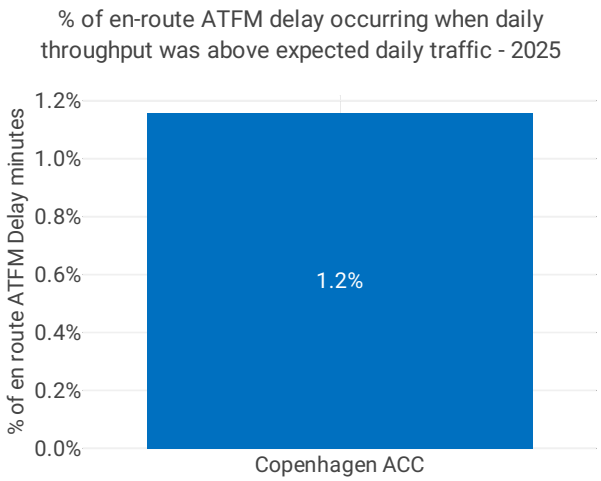
Regarding the identification and analysis by the NSA of the underlying reasons or circumstances having led to the performance target not being achieved, the NSA reports: *"The underperformance were minimal. The NSA agrees with Naviair on the reasons behind."*

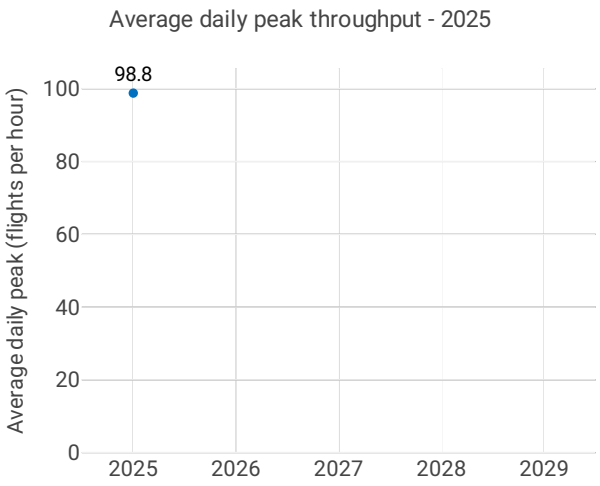
En route capacity incentive scheme

The Danish NSA reports that neither a financial bonus, nor malus, is applicable to Naviair, in regard to the 2025 en route capacity performance. The local en route incentive target was set at 0.1 mins/flight with a deadband of +/-0.04.

The actual value of 0.11 mins/flight falls within the deadband.

4.2.2 En route performance indicators at ACC level (PI#4-5)





Focus en route performance indicators at ACC level

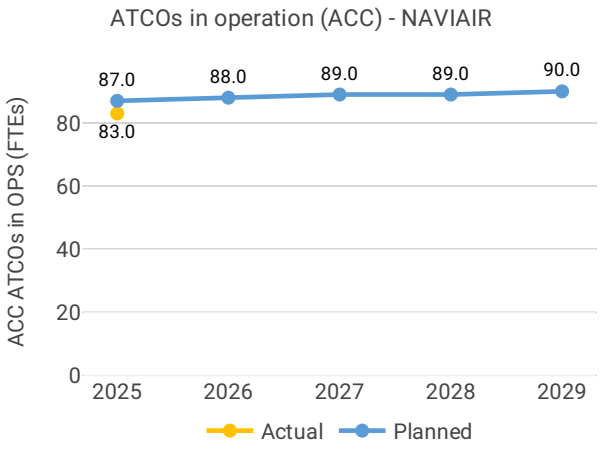
Percentage of total en route ATFM delay that occurred on days when the daily throughput was above the expected daily traffic

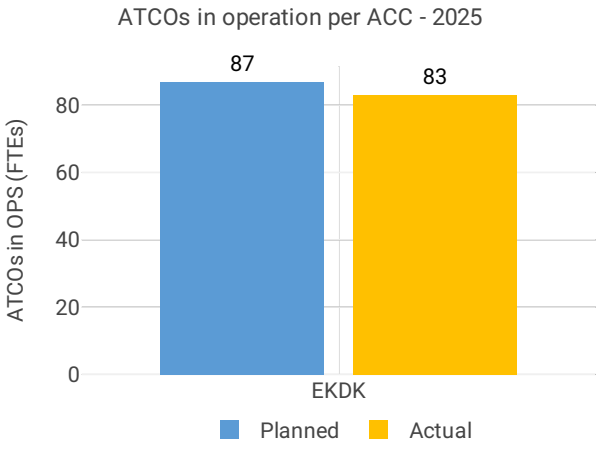
As background information on actual performance, the NSA reports: *"No remarks – there is still work being done to interpret and link the PI to the operational performance."*

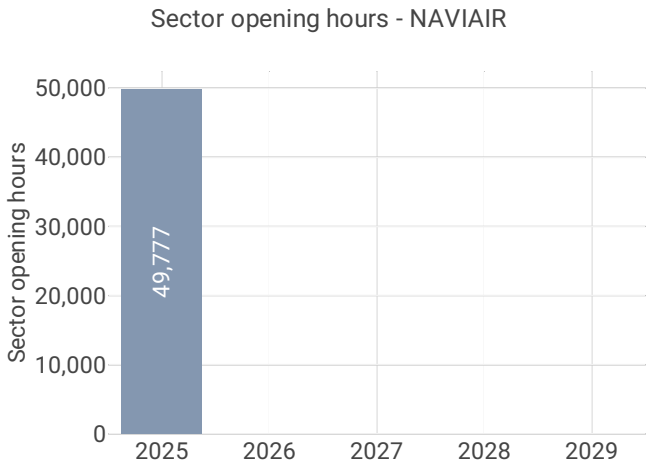
Annual weighted average of the daily peak throughput

As background information on actual performance, the NSA reports: *"No remarks – there is still work being done to interpret and link the PI to the operational performance."*

4.2.3 Other en route information







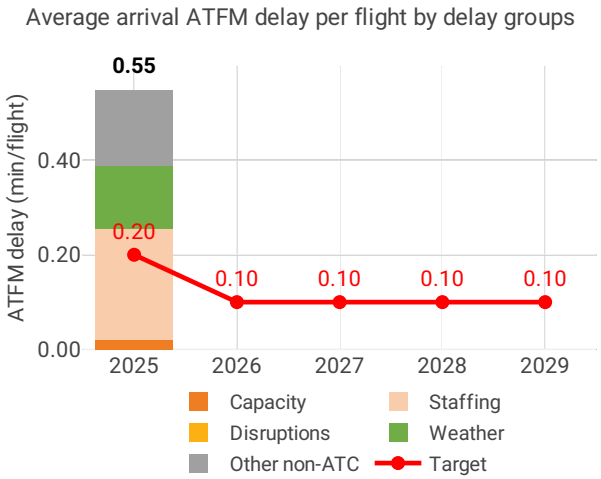
Focus on other en route information

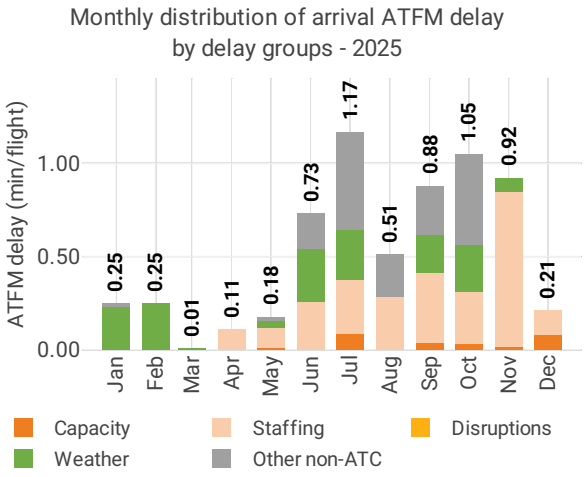
As additional comments to ATCOs in the scope of the performance scheme, the NSA reports: *"The number of ATCO in OPS turned out lower than expected, mainly reflecting a significantly weaker succession rate for our trainees than expected. Meanwhile, successful postponements of pension schemes lead to slightly fewer ATCO in OPS that stopped working in the OPS room."*

Regarding the training process, including details on the effective failure rate and the process used to allocate newly qualified ATCOs between ACC, APP and TWR positions, the NSA reports: *"While expectations were of an effective failure rate of 20%, the realized failure rate was closer to 60%."*

4.3 Terminal performance

4.3.1 Arrival ATFM delay (KPI#2)





Focus on arrival ATFM delay

Arrival ATFM delay

Average ATFM arrival delay in Denmark was 0.55 min/arr in 2025, the first year of RP4. The performance was very close to 2024, last year of RP3, when there were 0.50 min/arr.

The average for RP4 airports subject to monitoring of ATFM Arrival delay across Member States in 2025 was 0.97 min/arr.

Regarding the reasons and circumstances resulting in the achieved level of actual performance of the arrival ATFM delay per flight KPI, the NSA reports: *"The average delay was 0.55 minutes per flight in 2025, which on the same level as 2024-value of 0,50.*

42% of the delays were due to the reason ATC Staffing, 26% due to the reason Aerodrome capacity, 25% due to the reason Weather and 4% due to ATC Capacity.

Naviairs notes that there are currently an intensive focus on increasing staff-levels for Copenhagen Airports and the rest of Naviairs operational units. ATC staffing isolated (0.23) is on target level (0.20 in 2025), while more than 50% of delays can be attributed to factors related to Aerodrome or Weather. This trend with increasing other contributing factors is being monitored going forward."

Regarding the identification and analysis by the NSA of the underlying reasons or circumstances having led to the performance target not being achieved, the NSA reports: *"Most of the delay is attributed to factors outside the ANSPs sphere of influence. Besides that ATC staffing delay must be reduced."*

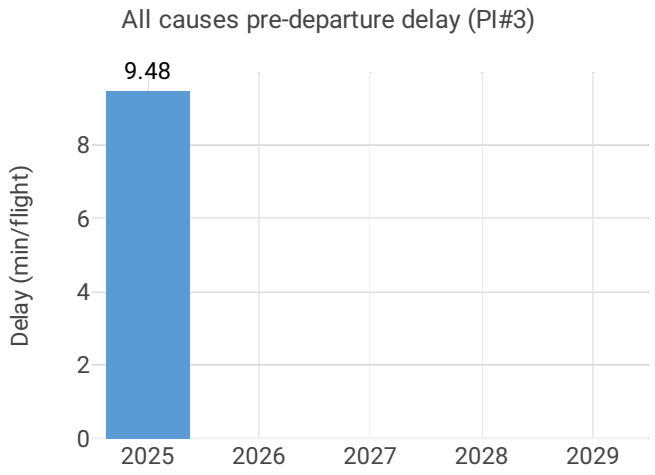
Regarding recommendations to the ANSP to rectify the situation, the NSA reports: *"Continued intense focus on increasing staffing levels in Naviair."*

Regarding remedial measures that have been / will be taken by the ANSP to rectify the situation, the NSA reports: *"The NSA is aware that recruitment and training are ongoing, with associated risks related to staffing levels and service delivery."*

Terminal capacity incentive scheme

In the first year of RP4, with an ATFM arrival delay of 0.55 min/arr, Denmark did not achieve the national target of 0.2 min/arr. The KPI is beyond the end of the malus sliding range for the incentive scheme, meaning that the maximum penalty of 1.0% applies. As such, the NSA computes a penalty of DKK 2,396,036.00.

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



Airport level										
	Avg arrival ATFM delay (KPI#2)					Slot adherence (PI#1)				
Airport name	**2025**	**2026**	**2027**	**2028**	**2029**	**2025**	**2026**	**2027**	**2028**	**2029**
Copenhagen	0.55	NA	NA	NA	NA	99.1%	NA	NA	NA	NA

	ATC pre departure delay (PI#2)					All causes pre departure delay (PI#3)				
Airport name	**2025**	**2026**	**2027**	**2028**	**2029**	**2025**	**2026**	**2027**	**2028**	**2029**
Copenhagen	0.14	NA	NA	NA	NA	9.5	NA	NA	NA	NA

Focus on other terminal performance indicators

ATFM slot adherence

ATFM slot adherence in 2025 was equal to 99.1%, very close to 2024 value – last year of RP3 – of 99.3%. This is the third highest among RP4 states. With regard to the 0.9% of flights that did not adhere, 0.8% were early and 0.1% were late.

The average for RP4 airports subject to monitoring of ATFM slot adherence across Member States in 2025 was 96.3%.

As background information on actual performance, the NSA reports: *"Performance is stable.*

NSA monitors the performance via monthly reports from the ANSP, and yearly evaluation.

A flow manager from Naviair is continuously monitoring and analysing the performance indicator and coordinates with involves airlines/airport when needed.

2024: 99,3% -> 2025 99,1% - No noticable difference in performance and amongst the highest in EU."

ATC pre-departure delay

Delay in 2025 was equal to 0.14 min/dep, very close to 2024 value– last year of RP3 – of 0.10 min/dep. This is the third lowest among RP4 states.

The average for RP4 airports subject to monitoring of ATC pre-departure delay across Member States and for which enough data is available in 2025 was 0.74 min/dep.

As background information on actual performance, the NSA reports: *"No remarks – the pre-departure values for both Total and ATC are the close to the lowest in Europe with minimal contribution from ATC."*

All causes pre-departure delay

Delay in 2025 decreased to 9.48 min/dep, 17% lower than 2024 value – last year of RP3 – of 11.52 min/dep. This is the third lowest among RP4 states.

The average for RP4 airports subject to monitoring of all causes pre-departure delay across Member States in 2025 was 16.47 min/dep.

As background information on actual performance, the NSA reports: *"No remarks – the pre-departure values for both Total and ATC are the close to the lowest in Europe with minimal contribution from ATC."*

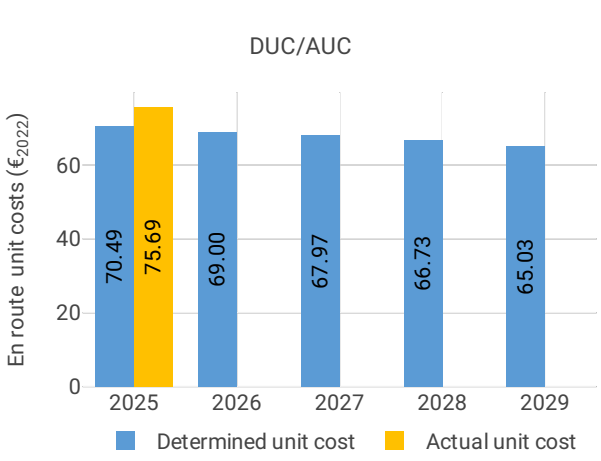
5 COST-EFFICIENCY - DENMARK

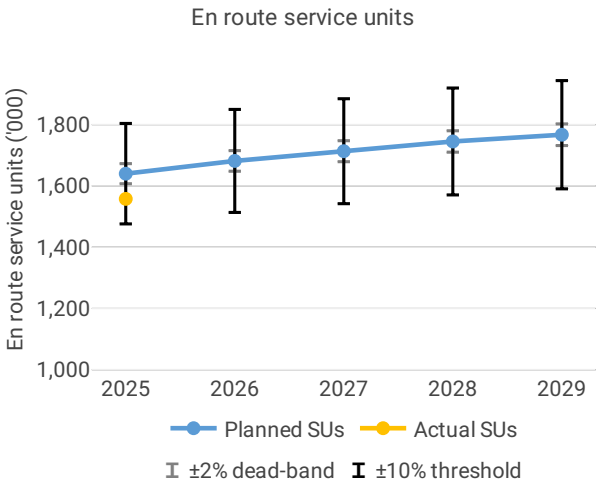
5.1 PRB monitoring

- The en route 2025 actual unit cost of Denmark was 75.69€2022, +7.4% higher than the determined unit cost (70.49€2022). The terminal 2025 actual unit cost was 170.86€2022, -2.4% lower than the determined unit cost (175.03€2022).
- The en route 2025 actual service units (1.56M) were -5.0% lower than the determined service units (1.64M).
- The en route 2025 actual total costs were +2.3M€2022 (+2.0%) higher than determined. This is mainly due to higher staff costs (+2.5M€2022, or +4.1%) for NAVIAIR, partially compensated by lower other operating costs than planned (-1.2M€2022, or -5.8%). The NSA explained that the increase in staff costs is due to the higher use of extra shifts due to the staffing situation.
- NAVIAIR spent 19.3M€2022 in 2025 related to costs of investments for both en route and terminal charging zones, +3.6% more than determined (18.6M€2022). According to the NSA, this increase is due to the higher activity level than planned.
- The en route actual unit cost incurred by users in 2025 was 75.67€ (+2.6% above the 2025 DUC), while the terminal actual unit cost incurred by users was 182.85€ (-1.0% below the 2025 DUC). The difference between the AUCU and the DUC for the en route charging zone is mainly driven by the traffic risk sharing adjustment, while for the terminal charging zone it is mainly driven by financial incentives.

5.2 En route charging zone

5.2.1 Unit cost (KPI#1)

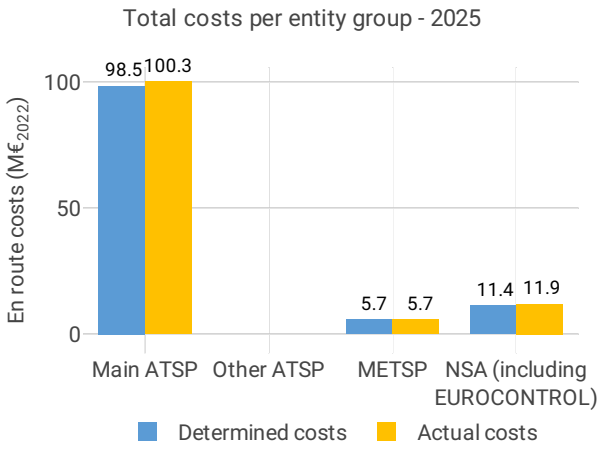


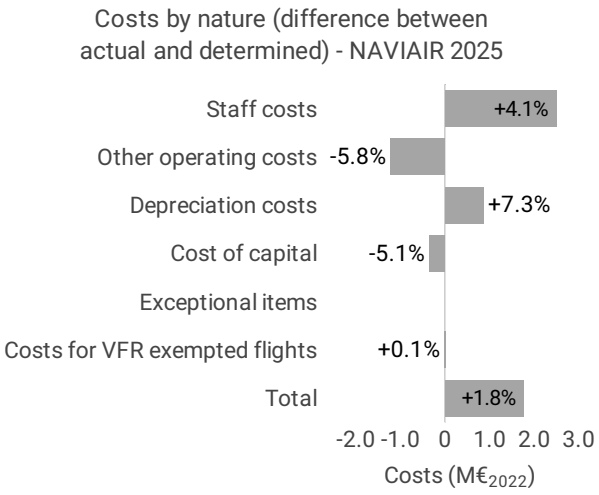


Actual and determined data					
Total costs - nominal (M€)	**2025**	**2026**	**2027**	**2028**	**2029**
Determined costs	121.4	123.6	125.8	127.5	127.4
Actual costs	123.6	NA	NA	NA	NA
Difference costs	2.3	NA	NA	NA	NA

Inflation assumptions	2025	2026	2027	2028	2029
Determined inflation rate	1.9%	2.1%	2.0%	2.0%	2.0%
Determined inflation index*	106.8	109	111.2	113.4	115.7
Actual inflation rate	1.8%	NA	NA	NA	NA
Actual inflation index*	106.6	NA	NA	NA	NA
Difference inflation index (p.p.)	-0.1	NA	NA	NA	NA

*100 = 2022





Focus on unit cost

AUC vs. DUC

In 2025, the en route AUC was +7.4% (or +38.69 DKK2022, +5.20 €2022) higher than the planned DUC. This results from the combination of significantly lower than planned TSUs (-5.0%) and higher than planned en route costs in real terms (+2.0%, or +17.1 MDKK2022, +2.3 M€2022).

En route service units

The difference between actual and planned TSUs (-5.0%) falls outside the ±2% dead-band, but does not exceed 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 regulatory result).

En route costs by entity

Actual real en route costs are +2.0% (+2.3 M€2022) higher than planned. This is the result of higher costs for the main ANSP, NAVIAIR (+1.8%, or +1.8 M€2022) and the NSA/EUROCONTROL (+4.8%, or +0.5 M€2022) and lower costs for the MET service provider (-0.2%).

En route costs for the main ANSP (NAVIAIR) at charging zone level

Based on the additional information to the en route reporting tables, the higher than planned en route costs in real terms for NAVIAIR in 2025 (+1.8%, or +1.8 M€2022) result from:

- Higher than planned staff costs (+4.1%), mainly due to the increased use of extra shifts attributed to the *"resource situation"*.

- Significantly lower than planned other operating costs (-5.8%), mainly due to lower or postponed expenditures in various cost items while the budget for training is considered on track.
- Significantly higher than planned depreciation (+7.3%), mainly due to a high activity level compared to plan.
- Significantly lower than planned cost of capital (-5.1%), mainly due to a lower bank loan interest rate than expected.
- Slightly higher than planned deduction for VFR exempted flights (+0.1%).

Assessment of the actual performance in the charging zone reported by the NSA

The NSA of Denmark provides the following overall assessment of the actual performance in 2025 at charging zone level:

"*Actual real en route costs are almost in line with determined costs (+2%). However real unit costs are 7,4% above DUC. This is due to actual service units being 5% below forecast.*"

Explanation of the differences between actual and determined costs at charging zone level reported by the NSA

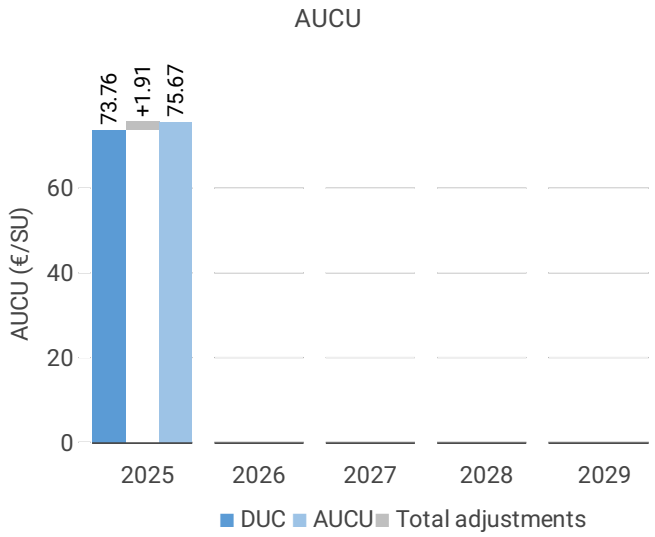
The NSA provides the following explanation for the differences between actual and determined costs in the charging zone:

"*Actual costs are not significantly above determined costs.*"

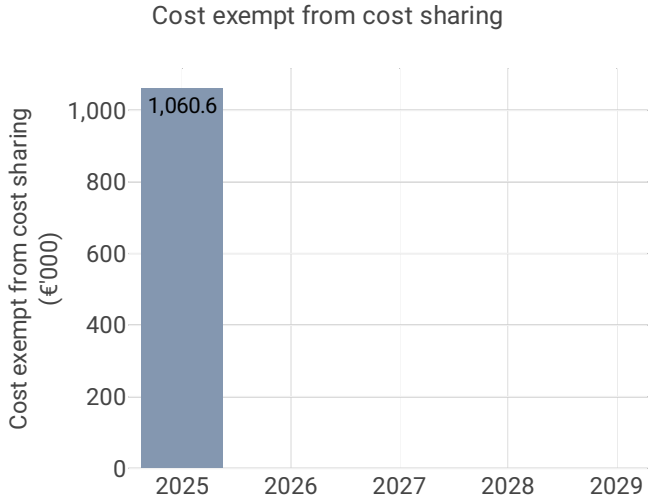
Recommendations formulated by the NSA to the ANSP (NAVIAIR) to rectify the situation and actions taken by the ANSP

The NSA 2025 monitoring report indicates that no recommendations were proposed by the NSA.

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



AUCU components (€/SU) – 2025	
Components of the AUCU in 2025	**€/SU**
DUC	**73.76**
Inflation adjustment	-0.08
Cost exempt from cost sharing	0.68
Traffic risk sharing adjustment	1.40
Traffic adjustment (costs not TRS)	0.56
Financial incentives	0.00
Modulation of charges	0.00
Cross-financing	0.00
Other revenues	-0.66
Application of lower unit rate	0.00
Total adjustments	1.91
AUCU	**75.67**
AUCU vs. DUC	**+ 2.6%**



Cost exempt from cost sharing – 2025		
Cost exempt from cost sharing by item - 2025	**€'000**	**€/SU**
New and existing investments	517.4	0.33
Competent authorities and qualified entities costs	614.1	0.39
Eurocontrol costs	-70.9	-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	**1,060.6**	**0.68**

Focus on AUCU

En route AUCU monitoring at charging zone level

The actual en route unit cost incurred by airspace users (AUCU) in respect of activities performed in 2025 (564.66 DKK or 75.67 €) is +2.6% higher than the nominal DUC (550.42 DKK or 73.76 €) which includes DUC initially charged: 558.44 DKK (or 74.84 €), and DUC to

be charged retroactively: -8.03 DKK (or -1.08 €). The difference between the AUCU and the nominal DUC (+14.24 DKK/SU or +1.91 €/SU) is due to:

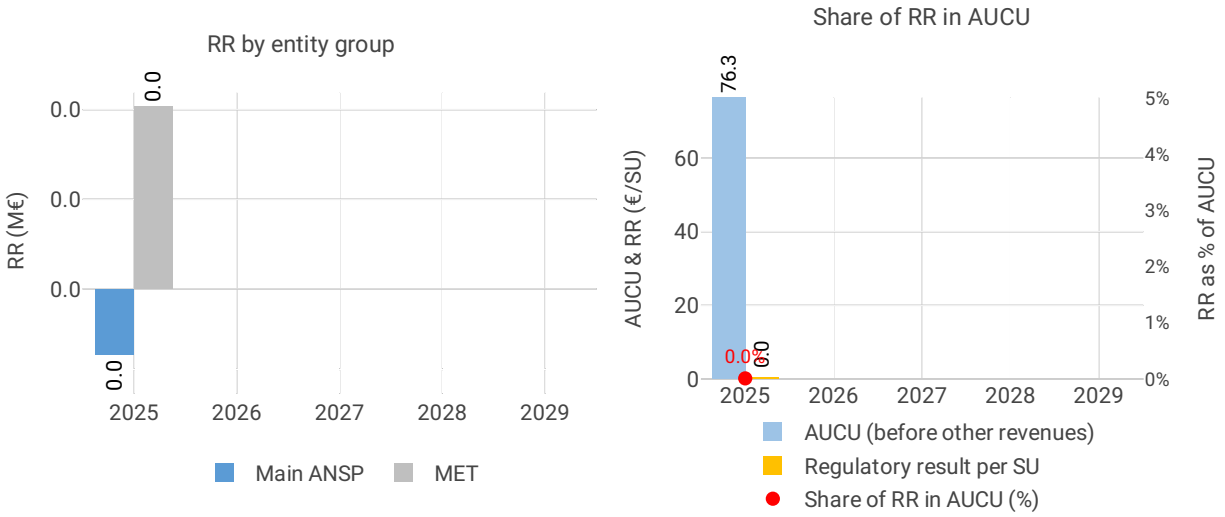
- the negative inflation adjustment resulting from lower than planned inflation (-0.60 DKK/SU or -0.08 €/SU);
- the impact of adjustments resulting from the costs exempted from cost sharing mechanism (+5.08 DKK/SU or +0.68 €/SU);
- the addition of the traffic risk sharing adjustments (+10.48 DKK/SU or +1.40 €/SU);
- the addition of the traffic adjustment (+4.18 DKK/SU or +0.56 €/SU) for the costs not subject to traffic risk sharing; and,
- the deduction of other revenues (-4.91 DKK/SU or -0.66 €/SU).

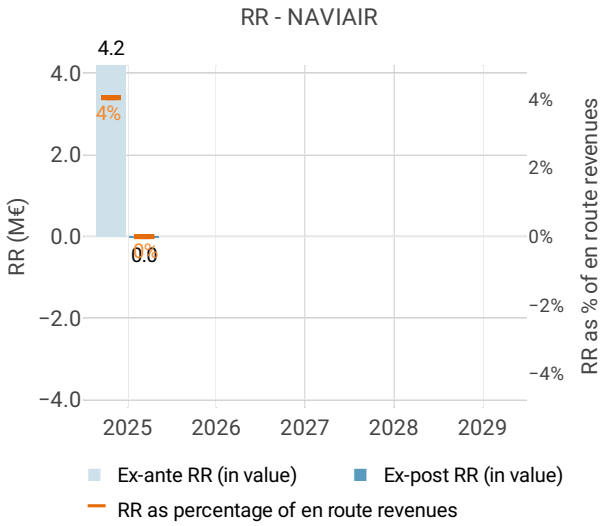
The share of the regulatory result (see next sub-section) in the AUCU (before the deduction of other revenues) is +0.01%.

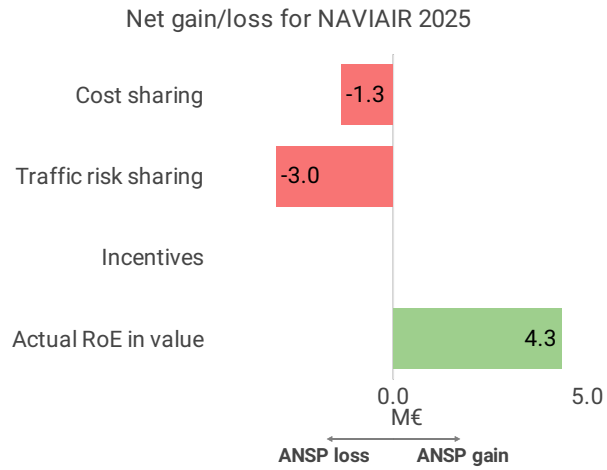
Initiatives implemented or planned that will improve this PI reported by the NSA

No information on such initiatives was provided in the NSA 2025 Monitoring Report.

5.2.3 Regulatory result (RR)







Focus on regulatory result

NAVIAIR net gain/loss on activity in the Denmark en route charging zone in 2025

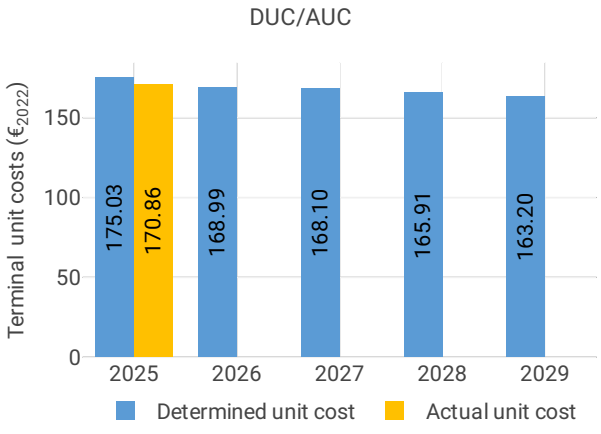
NAVIAIR reported a net loss of -4.3 M€, as a combination of a loss of -1.3 M€ arising from the cost sharing mechanism, with a loss of -3.0 M€ arising from the traffic risk sharing mechanism.

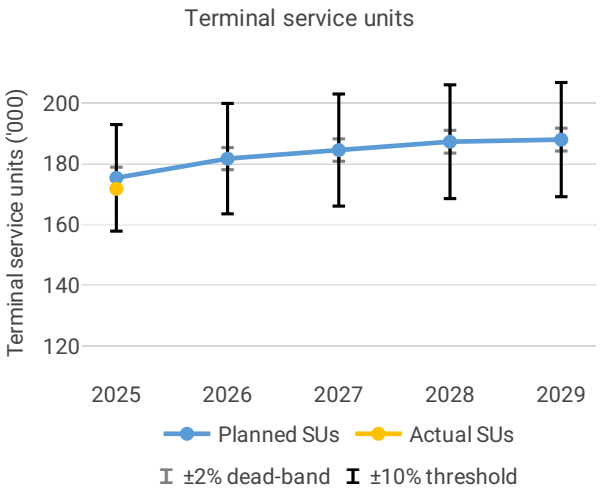
NAVIAIR overall regulatory result (RR) for the en route activity

Ex-post, the overall RR, taking into account the net loss from the en route activity mentioned above (-4.3 M€) and the actual RoE (+4.3 M€), amounts to -0.01 M€ (0.01% of the en route revenues). The resulting ex-post rate of return on equity is negative (-0.01%) compared to the 5.0% planned in the PP.

5.3 Terminal charging zone

5.3.1 Unit cost (KPI#1)

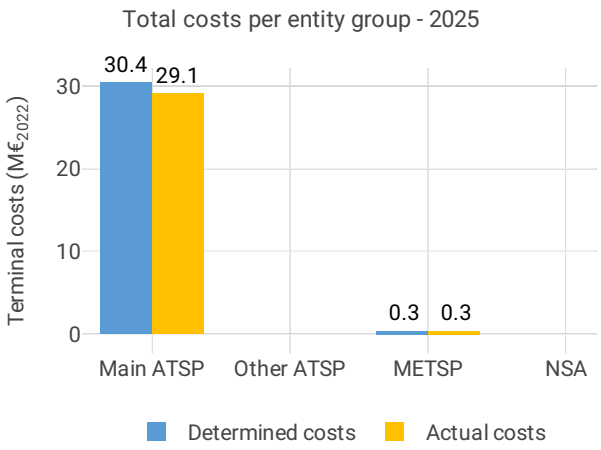


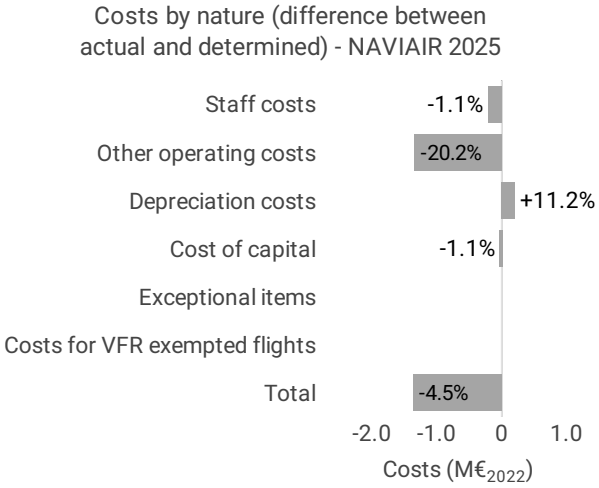


Actual and determined data					
Total costs - nominal (M€)	**2025**	**2026**	**2027**	**2028**	**2029**
Determined costs	32.5	33.1	34.1	34.7	34.9
Actual costs	31.0	NA	NA	NA	NA
Difference costs	-1.5	NA	NA	NA	NA

Inflation assumptions	**2025**	**2026**	**2027**	**2028**	**2029**
Determined inflation rate	1.9%	2.1%	2.0%	2.0%	2.0%
Determined inflation index*	106.8	109	111.2	113.4	115.7
Actual inflation rate	1.8%	NA	NA	NA	NA
Actual inflation index*	106.6	NA	NA	NA	NA
Difference inflation index (p.p.)	-0.1	NA	NA	NA	NA

*100 = 2022





Focus on unit cost

AUC vs. DUC

In 2025, the terminal AUC was -2.4% (or -30.98 DKK2022, -4.17 €2022) lower than the planned DUC. This results from the combination of lower than planned terminal costs in real terms (-4.4%, or -10.0 MDKK2022, -1.3 M€2022) and lower than planned TNSUs (-2.1%).

Terminal service units

The difference between actual and planned TNSUs (-2.1%) falls outside the ±2% dead-band, but does not exceed the ±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 regulatory result).

Terminal costs by entity

Actual real terminal costs are -4.4% (-1.3 M€2022) lower than planned. This is the result of lower costs for the main ANSP, NAVIAIR (-4.5%, or -1.4 M€2022) and higher costs for the MET service provider (+6.7%).

Terminal costs for the main ANSP (NAVIAIR) at charging zone level

Based on the additional information to the terminal reporting tables, the lower than planned terminal costs in real terms for NAVIAIR in 2025 (-4.5%, or -1.4 M€2022) result from:

- Slightly lower than planned staff costs (-1.1%).
- Significantly lower than planned other operating costs (-20.2%), mainly due to lower or postponed expenditures in various cost items, with the exception of training costs which were on plan.
- Significantly higher than planned depreciation (+11.2%), mainly due to a high activity level compared to plan.
- Slightly lower than planned cost of capital (-1.1%), mainly due to a lower bank loan interest rate than expected.

Assessment of the actual performance in the charging zone reported by the NSA

The NSA of Denmark provides the following overall assessment of the actual performance in 2025 at charging zone level:

"*Lower OPEX (not training) means that real unit costs are 2.4% below DUC despite traffic also being lower than planned.*"

Explanation of the differences between actual and determined costs at charging zone level reported by the NSA

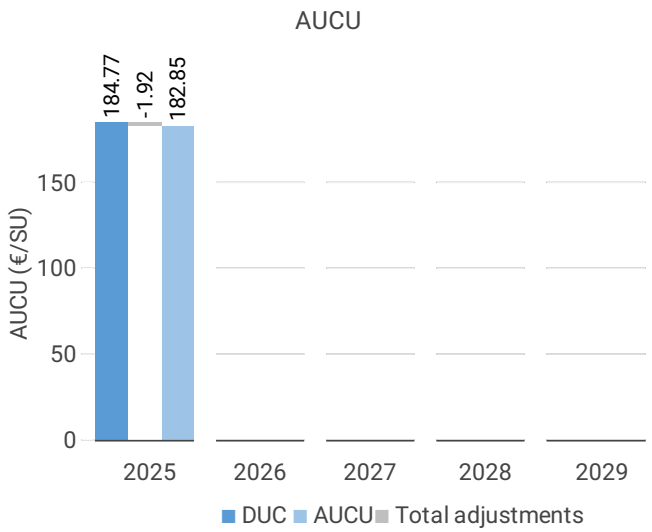
The NSA provides the following explanation for the differences between actual and determined costs in the charging zone:

"*The difference is due to lower OPEX except for training and lower interest. However, the difference is relatively small and does not need to be rectified.*"

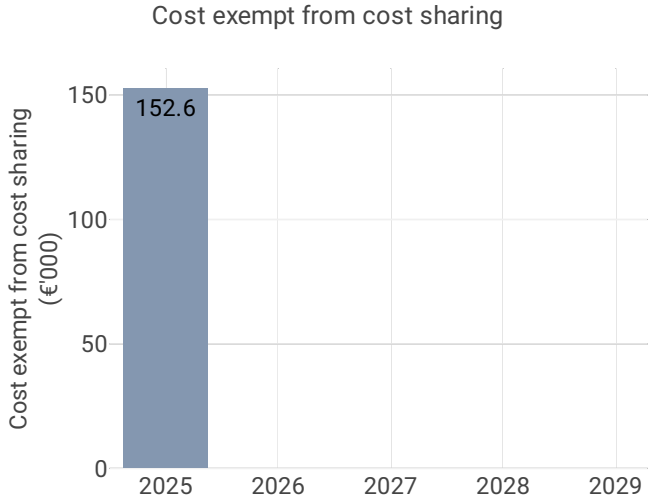
Recommendations formulated by the NSA to the ANSP (NAVIAIR) to rectify the situation and actions taken by the ANSP

No information was provided in the NSA 2025 Monitoring Report.

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



AUCU components (€/SU) – 2025	
Components of the AUCU in 2025	**€/SU**
DUC	**184.77**
Inflation adjustment	-0.23
Cost exempt from cost sharing	0.89
Traffic risk sharing adjustment	0.08
Traffic adjustment (costs not TRS)	0.04
Financial incentives	-1.87
Modulation of charges	0.00
Cross-financing	0.00
Other revenues	-0.82
Application of lower unit rate	0.00
Total adjustments	-1.92
AUCU	**182.85**
AUCU vs. DUC	**-1.0%**



Cost exempt from cost sharing – 2025		
Cost exempt from cost sharing by item - 2025	**€'000**	**€/SU**
New and existing investments	152.6	0.89
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	**152.6**	**0.89**

Focus on AUCU

Terminal AUCU monitoring at charging zone level

The actual terminal unit cost incurred by airspace users (AUCU) in respect of activities performed in 2025 (1 364.42 DKK or 182.85 €) is -1.0% lower than the nominal DUC (1 378.75 DKK or 184.77 €) which includes DUC initially charged: 1 443.11 DKK (or 193.40 €), and

DUC to be charged retroactively: -64.36 DKK (or -8.62 €). The difference between the AUCU and the nominal DUC (-14.33 DKK/SU or -1.92 €/SU) is due to:

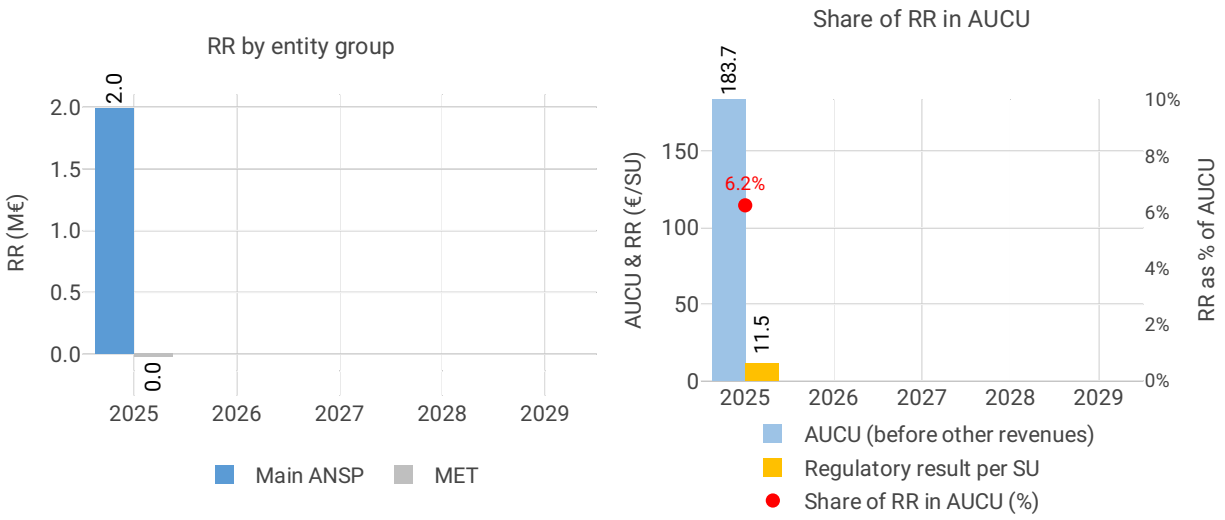
- the negative inflation adjustment resulting from lower than planned inflation (-1.70 DKK/SU or -0.23 €/SU);
- the impact of adjustments resulting from the costs exempted from cost sharing mechanism (+6.63 DKK/SU or +0.89 €/SU);
- the addition of the traffic risk sharing adjustments (+0.56 DKK/SU or +0.08 €/SU);
- the addition of the traffic adjustment (+0.26 DKK/SU or +0.04 €/SU) for the costs not subject to traffic risk sharing;
- the impact of financial incentives (-13.95 DKK/SU or -1.87 €/SU); and,
- the deduction of other revenues (-6.14 DKK/SU or -0.82 €/SU).

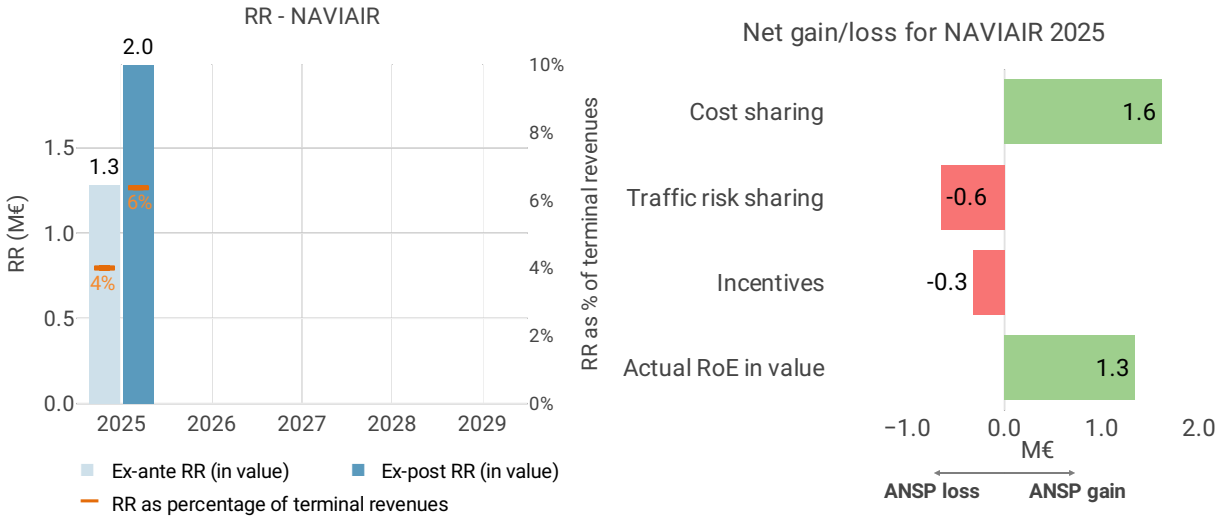
The share of the regulatory result (see next sub-section) in the AUCU (before the deduction of other revenues) is 6.2%.

Initiatives implemented or planned that will improve this PI reported by the NSA

No information on such initiatives was provided in the NSA 2025 Monitoring Report.

5.3.3 Regulatory result (RR)





Focus on regulatory result

NAVIAIR net gain/loss on activity in the Denmark terminal charging zone in 2025

NAVIAIR reported a net gain of +0.6 M€, as a combination of a gain of +1.6 M€ arising from the cost sharing mechanism, with a loss of -0.6 M€ arising from the traffic risk sharing mechanism and a loss of -0.3 M€ relating to financial incentives.

NAVIAIR overall regulatory result (RR) for the terminal activity

Ex-post, the overall RR, taking into account the net gain from the terminal activity mentioned above (+0.6 M€) and the actual RoE (+1.3 M€), amounts to +2.0 M€ (6.4% of the terminal revenues). The resulting ex-post rate of return on equity is 7.4%, which is higher than the 5.0% planned in the PP.