PERFORMANCE REVIEW BOARD
of the Single European Sky

Performance Review Board

Monitoring Report

Greece - 2025

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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 2026-06-27 (GR12452_A EL12068_Greece_prefilled AMR 2025 vfii.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 2
Athens ACC
Makedonia ACC

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

Exchange rate (1 EUR=)
2022: 1 EUR
2025: 1 EUR

Share of Union-wide:
- **traffic (TSUs) 2025** 5.9%
- **en route costs 2025** 2.6%

Share en route / terminal costs 2025 88% / 12%

En route charging zone(s)
Greece

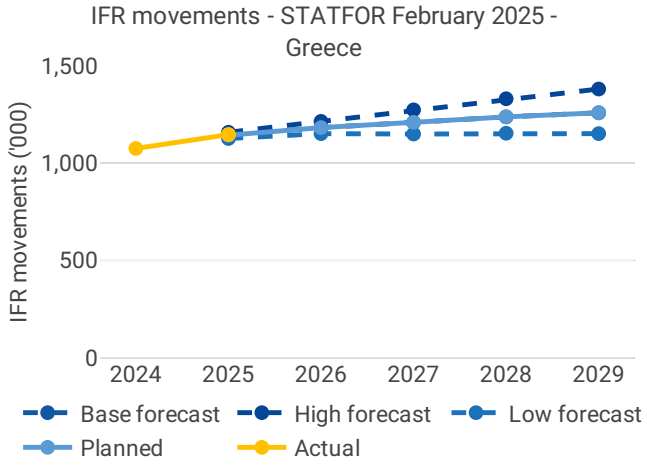
Terminal charging zone(s)
Greece

Main ANSP
- HASP

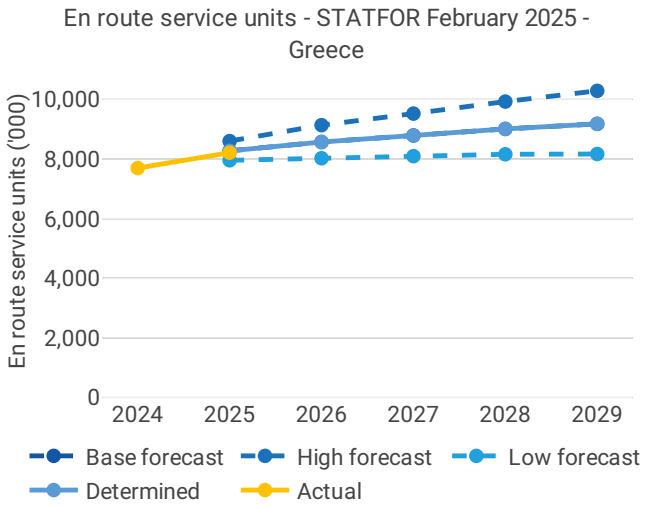
Other ANSPs
–

MET Providers
- HNMS

1.2 Traffic (En route traffic zone)

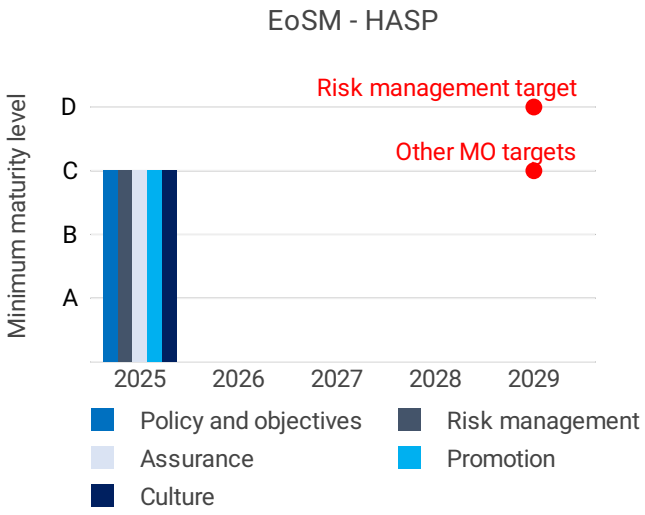


- Greece recorded 1,146K actual IFR movements in 2025, +6.6% compared to 2024 (1,075K).
- Actual 2025 IFR movements were in line with the plan (1,143K).
- Actual 2025 IFR movements were +29.7% above the actual 2019 level (884K).



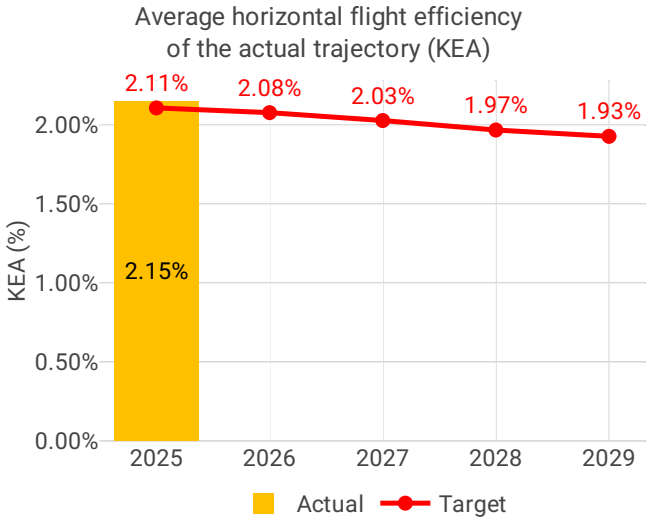
- Greece recorded 8,212K actual service units in 2025, +6.7% compared to 2024 (7,698K).
- Actual 2025 service units were -0.7% below the plan (8,274K).
- Actual 2025 service units are +36.8% above the actual 2019 level (6,005K).

1.3 Safety (Main ANSP)



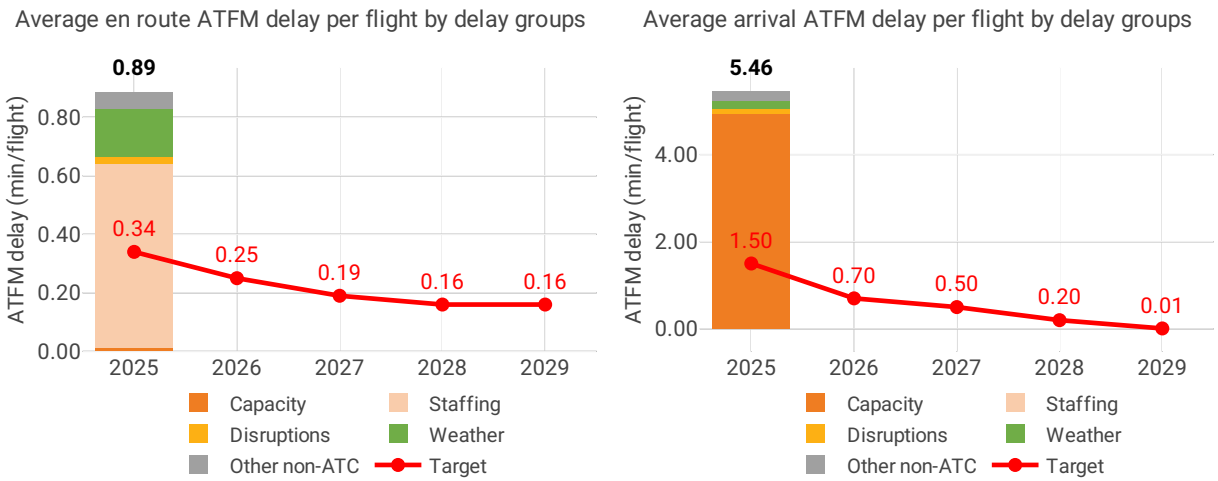
- In 2025, HASP achieved the planned maturity levels set out in its performance plan for all five components of the EoSM.
- The rate of runway incursions (RI) was 0.69 and equal to the RIs with ANS contribution, with both indicators below the Union-wide average. Compared to 2024, rate of RIs has decreased at both levels.
- The rate of separation minima infringements (SMIs) at State level was 8.25 and equal to the SMIs at ANSP level. Both indicators were above the Union-wide average. When comparing to 2024, rate of SMIs has decreased at both State and ANSP level.

1.4 Environment (Member State)



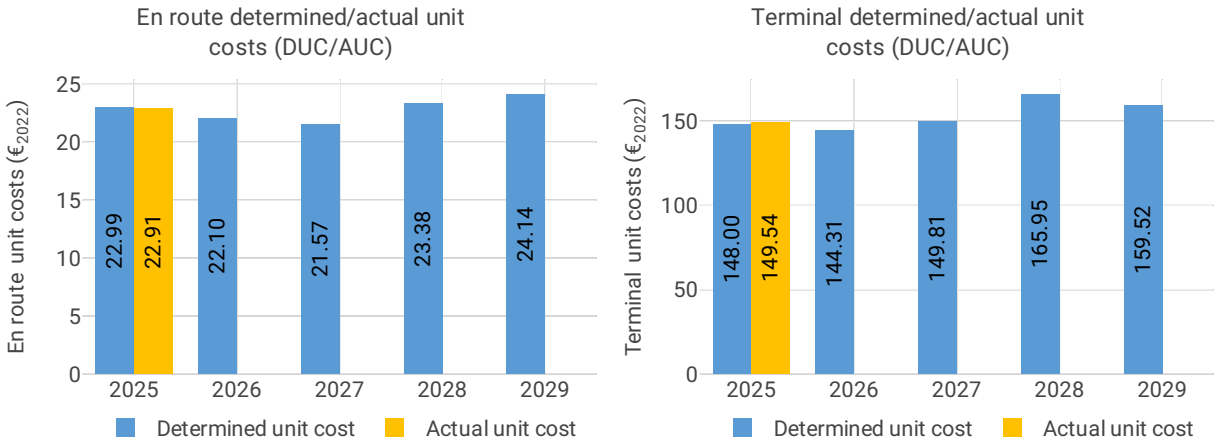
- Greece registered a KEA performance of 2.15%. Their target of 2.11% was not achieved and Greece did not contribute positively to Union-wide performance. The NSA states the main reason for not meeting the target can be mainly attributed to factors beyond the ANSPs direct influence, like activation of military areas, weather, and high levels of traffic above STATFOR forecast.
- KEP and KES remained stable in 2025, with marginal improvements compared to 2024.
- VFE of the actual trajectory was at 72.39%, which was worse than the Union-wide average.
- The average time in level flight during descent was stable and during climb degraded marginally.
- Additional taxi-out time and additional taxi-in time remained stable compared to 2024.
- Additional time in the arrival sequencing and metering area remained stable at 3.37 min/flight.

1.5 Capacity (Member State)



- Greece registered 0.90 minutes of average en route ATFM delay per flight during 2025, which has been adjusted to 0.89 during the post-ops adjustment process, thus not achieving the local target value of 0.34. Delays in Greece decreased by -0.08 minutes per flight year-on-year.
- Delays were highest in June and August, mostly driven by ATC staffing.
- The share of delayed flights with delays longer than 15 minutes in Greece decreased by -5 percentage points compared to 2024 and was lower than 2019 values.
- The number of ATCOs in OPS in Greece was 177 being below the 2025 plan by -23 FTE.
- The yearly total of sector opening hours in Athens and Makedonia ACCs was 58,255, showing a 4% increase compared to 2024.
- Athens and Makedonia ACCs registered 18.84 IFR movements per one sector opening hour in 2025, being 4% above 2024 levels.
- Greece registered an average airport arrival ATFM delay of 5.46 minutes per flight in 2025, thus not achieving the local target of 1.5 minutes. Compared to 2024, average arrival ATFM delays in Greece were 2.00 minutes per flight higher in 2025.
- The main drivers of delays were ATC capacity, accounting for 4.94 of the total delays, and other non-ATC causes, responsible for 0.22.

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



- The en route 2025 actual unit cost of Greece was 22.91€2022, -0.3% lower than the determined unit cost (22.99€2022). The terminal 2025 actual unit cost was 149.54€2022, +1.0% higher than the determined unit cost (148.00€2022).
- The en route 2025 actual service units (8.2M) were -0.7% lower than the determined service units (8.3M).
- The en route 2025 actual total costs were -2.1M€2022 (-1.1%) lower than determined. This is mainly due to lower other operating costs for all entities (-2.7M€2022, or -8.1%). The NSA noted that it is mainly due to payments of HASP that were incurred on a cash basis, lower operational, training and travel expenses for MET, and a more efficient utilization of assets by NSA SAR. This was partially compensated by higher staff costs than planned for

the NSA SAR (+1.1M€2022, or +37.0%), due to new laws for Hellenic Air Force Staff and Cost Guard.

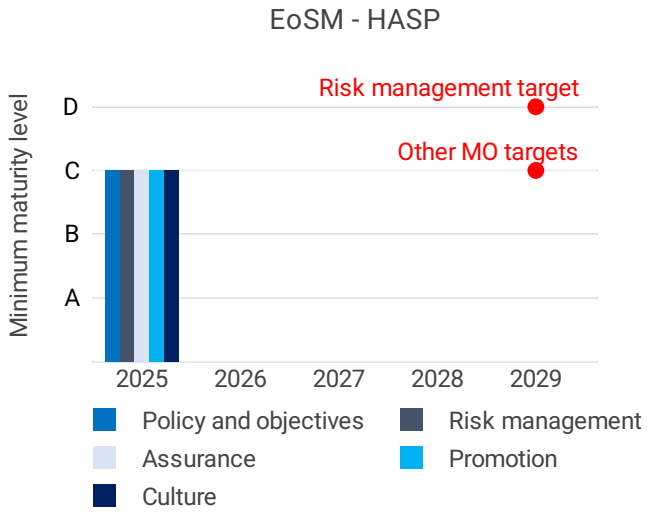
- For the timely implementation of the investment plan, the NSA reports that *"a decision at ministerial level was taken in collaboration with the Commission and EASA, in order to map an action plan for monitoring the investment plan with reporting every six weeks."* However, HASP spent 1.7M€2022 in 2025 related to costs of investments for both en route and terminal charging zones, -12.9% less than determined (2.0M€2022). According to the NSA, this reduction is due to a delay in the implementation of projects expected to be put into operation in 2026 instead of 2025.
- The en route actual unit cost incurred by users in 2025 was 25.86€ (+3.5% above the 2025 DUC), while the terminal actual unit cost incurred by users was 160.05€ (-1.1% below the 2025 DUC). The difference between the AUCU and the DUC for the en route charging zone is mainly driven by the investment costs in cost exempt from cost sharing.

2 SAFETY - GREECE

2.1 PRB monitoring

- In 2025, HASP achieved the planned maturity levels set out in its performance plan for all five components of the EoSM.
- The rate of runway incursions (RI) was 0.69 and equal to the RIs with ANS contribution, with both indicators below the Union-wide average. Compared to 2024, rate of RIs has decreased at both levels.
- The rate of separation minima infringements (SMIs) at State level was 8.25 and equal to the SMIs at ANSP level. Both indicators were above the Union-wide average. When comparing to 2024, rate of SMIs has decreased at both State and ANSP level.

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

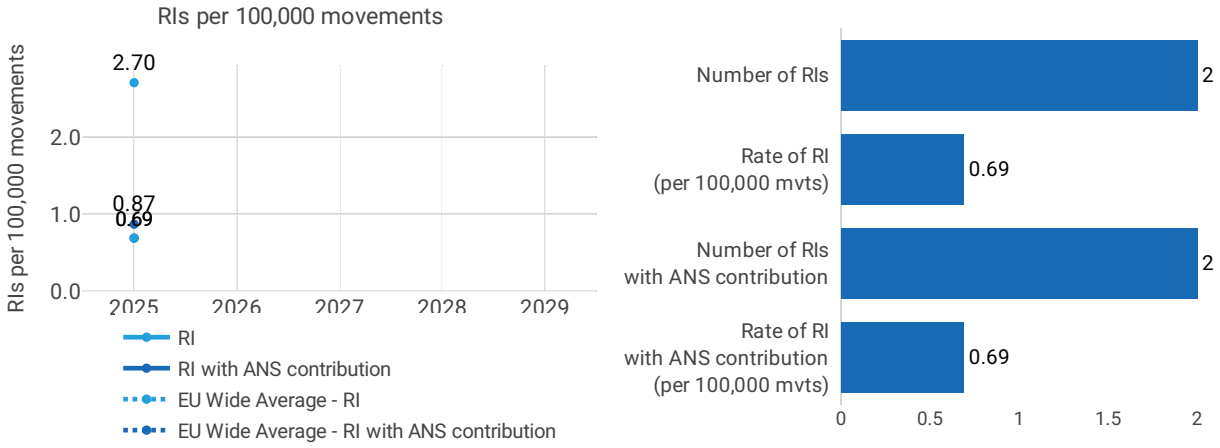


Focus on EoSM

In 2025, HASP achieved the planned maturity levels set out in its performance plan for all five components of the EoSM.

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 - Greece						
#	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	Athinai-Eleftherios Venizelos	290,104	2	0.69	2	0.69

Focus on runway incursions

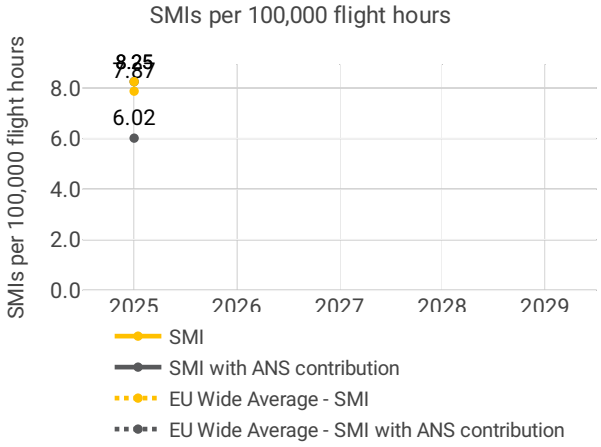
Greece reported 2 runway incursions (RI) at Athens airport during 2025. When comparing the RIs at airport level to Union-wide level, Greece was lower than Union-wide average (0.69 vs 2.70).

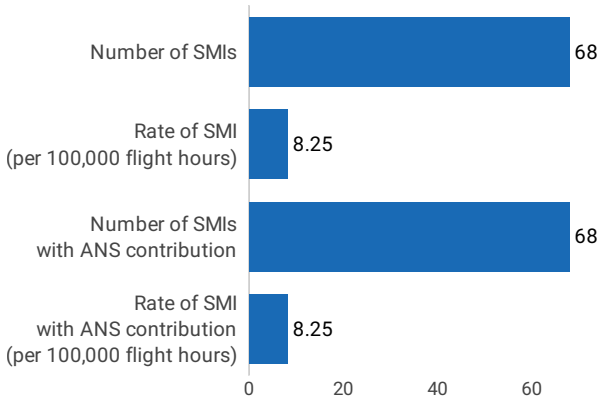
Greece reported 2 runway incursions with ANS contribution in 2025. When comparing airport level with ANS contribution to the Union-wide level, Greece was slightly below the Union-wide average (0.69 vs 0.87).

The rate of runway incursions has decreased compared to 2024 at airport level (0.69 vs 3.91) and remained stable at ANS contribution-level (0.69 vs 0.73).

The monitoring report notes that the improvements in both RI and SMI performance indicators are mainly through internal compliance monitoring, investigation of occurrences and systematic training of ATCOs. The NSA notes in the monitoring report that it intends to monitor the effectiveness on performance mainly through the annual oversight cycle, oversight of occurrence reporting and oversight of change management.

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	HASP	824,132	NA	NA	NA	NA	68	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	HASP	8	NA	NA	NA	NA					

Focus on separation minima

At State level, Greece reported 68 separation minima infringements (SMI) in their airspace during 2025. The rate of separation minima infringements was higher than Union-wide average (8.25 vs 7.87). At ANSP level, Greece reported 68 SMIs with ANS contribution. The rate of separation minima infringements at ANSP level was higher than the Union-wide average (8.25 vs 6.02).

When comparing to 2024, the rate of separation minima infringements has decreased at both State level (8.25 vs 9.05) and at ANSP level (8.25 vs 9.05).

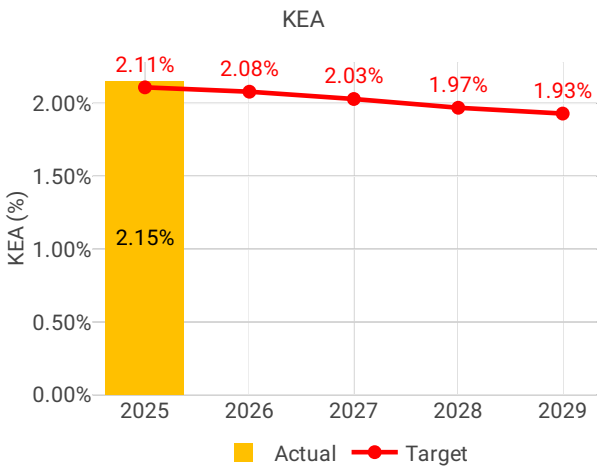
3 ENVIRONMENT - GREECE

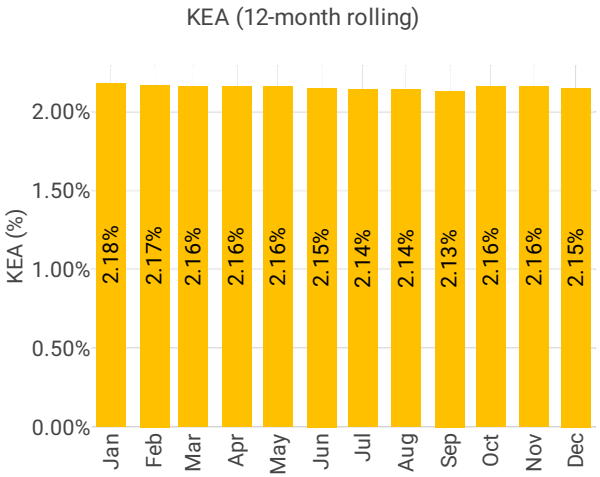
3.1 PRB monitoring

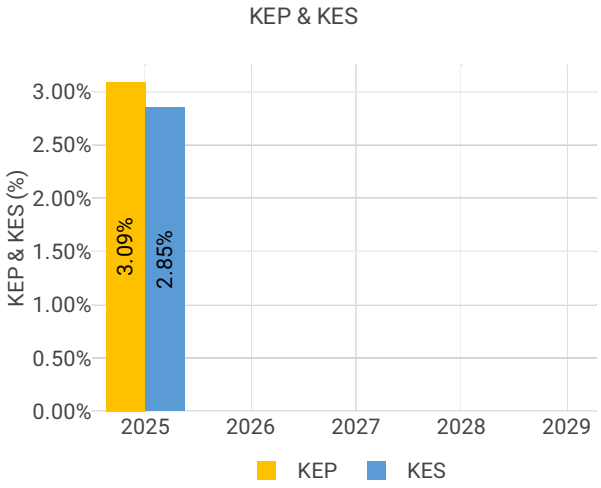
- Greece registered a KEA performance of 2.15%. Their target of 2.11% was not achieved and Greece did not contribute positively to Union-wide performance. The NSA states the main reason for not meeting the target can be mainly attributed to factors beyond the ANSPs direct influence, like activation of military areas, weather, and high levels of traffic above STATFOR forecast.
- KEP and KES remained stable in 2025, with marginal improvements compared to 2024.
- VFE of the actual trajectory was at 72.39%, which was worse than the Union-wide average.
- The average time in level flight during descent was stable and during climb degraded marginally.
- Additional taxi-out time and additional taxi-in time remained stable compared to 2024.
- Additional time in the arrival sequencing and metering area remained stable at 3.37 min/flight.

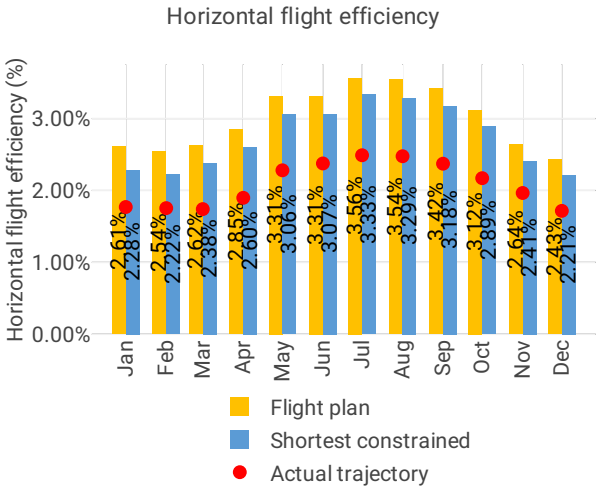
3.2 En route performance

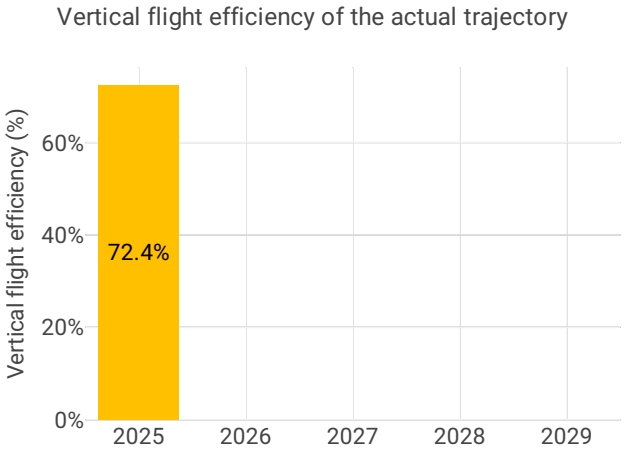
3.2.1 Horizontal flight efficiency of the actual trajectory (KEA) (KPI#1), of the last filed flight plan (KEP) (PI#1) , shortest constrained route (KES) (PI#2) and vertical flight efficiency of the actual trajectory (VFE) (PI#3)











Focus on en route performance

KEA

In terms of absolute values, the indicator has been improving both for KEA and the KEA corrected for the war in Ukraine (2.26% in 2023, 2.19% in 2024 and 2.15% for KEA; 2.13% in 2023, 2.04% in 2024 and 1.97% in 2025).

The values of the internal additional distance are relatively high (24th in ranking every year) but improving: 3.11 km per flight in 2023, 2.90 km per flight in 2024, 2.77 km per flight in 2025.

In terms of overall contribution to the additional distance in the SES area, Greece sits 22nd with 4.42%.

Regarding the assessment of the achieved level of actual performance in the environment KPA, the NSA reports: *"The main reasons that affected performance in this key performance area are: 1) Activation of military areas 2) Adverse weather phenomena during the summer season 3) High levels of traffic above STATFOR Forecast."*

Regarding the implementation of major operational or structural changes during the calendar year impacting performance in this key performance area, the NSA reports: *"During 2025 , CB FRA with Malta FRA and Nicosia FRA - Phase A (27 NOV 25)"*

Regarding progress on the implementation of the measures committed to in the ERNIP, the NSA reports: *"During 2025 , CB FRA with Malta FRA and Nicosia FRA - Phase A (27 NOV 25) - ERNIP proposals 112.031a , 112.036a"*

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: *"Main reasons or circumstances having led to the performance target not being achieved : 1) The activation of military areas that reduced the availability of shorter routings 2) The higher-than-forecast demand suggests that dynamic airspace/sector configurations may not have been sufficient to fully accommodate the traffic increase while maintaining environmental performance. Restrictions in specific sectors force operators to file via longer routings. 3) Traffic growth significantly increased the complexity. 4) Weather events required tactical unexpected rerouting of traffic, resulting in longer flight trajectories. The combined effect of military activity, weather disruptions, and traffic growth may have limited the availability of optimal routes and direct routings, reducing the ANSP's ability to achieve the planned KEA target."*

Regarding recommendations to the ANSP to rectify the situation, the NSA reports: *"Conduct periodic analyses of the environmental impact of military area activations*

and weather-related reroutings and identify mitigation measures in cooperation with relevant stakeholders."

Regarding remedial measures that have been / will be taken by the ANSP to rectify the situation, the NSA reports: *"The ANSP has already implemented measures aimed at improving environmental performance, including:*

strengthening civil-military coordination arrangements to maximise the availability and flexible use of airspace and to minimise the duration and impact of military area activations; and

increasing the use of dynamic airspace management, conditional routes and direct routings whenever operationally feasible.

These measures are subject to continuous assessment and monitoring by both the ANSP and the NSA to evaluate their effectiveness and to identify further opportunities for improvement in flight efficiency performance."

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: *"PBN procedures for 31 airports are planned for the forthcoming year, cross border FRA with Cyprus has been implmented in 2025."*

KES

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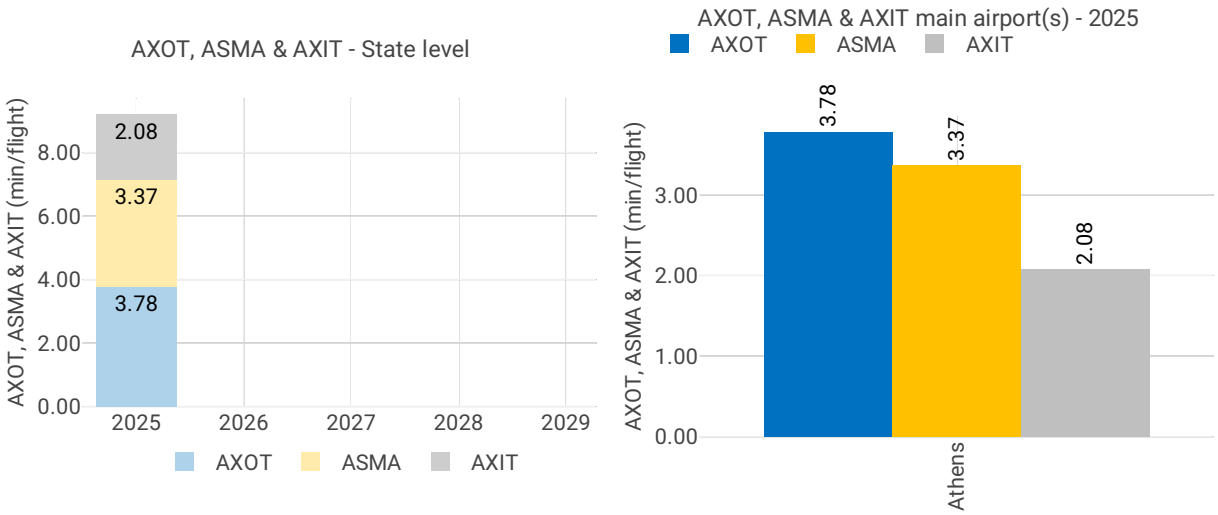
Vertical flight efficiency

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: *"The ANSP has implemented measures aimed at improving the vertical flight efficiency of actual en-route trajectories, including the application of Flexible Use of Airspace (FUA) principles, enhanced civil-military coordination, and operational procedures designed to minimise unnecessary level-offs and flight level changes. Moreover, within the framework of the ATHENIAN Project, which includes the redesign of the terminal airspace (TMA) and the implementation of new Performance-Based Navigation (PBN) procedures, dedicated arrival and departure routes are planned to be developed in order to improve traffic flows and enhance flight efficiency. Furthermore, as part of the national plan for the implementation of PBN procedures at all Greek airports by 2030, the ANSP will examine the development of routes designed to facilitate uninterrupted climb and descent operations, thereby reducing the need for level-offs and contributing to improved vertical flight efficiency.*

These measures are continuously monitored and assessed by the ANSP to evaluate their effectiveness and identify opportunities for further optimisation. The NSA conducts regular oversight through the review of performance data, annual performance reports, and dedicated performance meetings with the ANSP."

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
Athens	3.78	NA	NA	NA	NA	3.37	NA	NA	NA	NA	2.08	NA	NA	NA	NA

Focus on AXOT, AXIT & ASMA

AXOT

The additional time in 2025 decreased to 3.78 min/dep, very close to the 2024 value – last year of RP3 – of 3.86 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: *"The ANSP, in cooperation with the airport operator and other operational stakeholders, has implemented measures aimed at reducing additional taxi-out and taxi-in times, including improved surface movement management, enhanced coordination between ATS units and airport stakeholders, and measures to minimise ground delays where operationally feasible.*

The NSA continuously monitors the effectiveness of these measures through the review of performance data and regular performance oversight activities. Particular attention is given to trends in additional taxi-out and taxi-in times and to the identification of operational factors contributing to delays on the manoeuvring area."

AXIT

The additional time in 2025 was equal to 2.08 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: *"The ANSP, in cooperation with the airport operator and other operational stakeholders, has implemented measures aimed at reducing additional taxi-out and taxi-in times, including improved surface movement management, enhanced coordination between ATS units and airport stakeholders, and measures to minimise ground delays where operationally feasible.*

The NSA continuously monitors the effectiveness of these measures through the review of performance data and regular performance oversight activities. Particular attention is given to trends in additional taxi-out and taxi-in times and to the identification of operational factors contributing to delays on the manoeuvring area."

ASMA

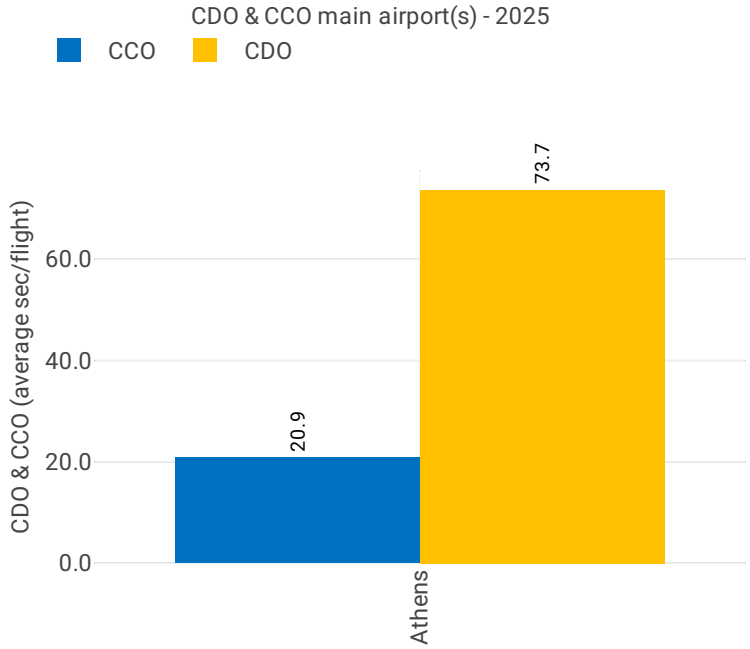
The additional time in 2025 resulted in 3.37 min/arr, very close to 2024 value – last year of RP3 – of 3.41 min/arr (*using the new methodology*).

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: *"Within the framework of the ATHENIAN Project, new Performance-Based Navigation (PBN) procedures are being developed in order to improve traffic flows and enhance flight efficiency. The ATHENIAN Project is*

expected to be completed in 2028."

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), average times flown level during descent are 75.5 seconds per flight lower in Greece. Athens (LGAV) has an average time flown level of 73.7 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: *"Within the framework of the ATHENIAN Project, new Performance-Based Navigation (PBN) procedures are being developed*

in order to improve traffic flows and enhance flight efficiency. The ATHENIAN Project is expected to be completed in 2028."

Vertical flight efficiency of the climb

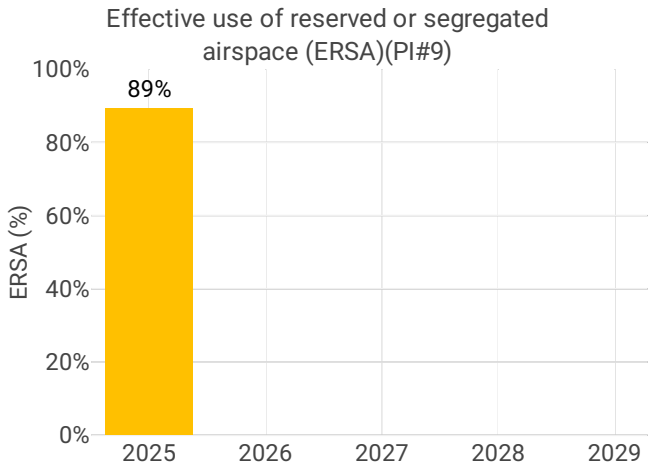
Compared to the overall RP4 average value (34.8 seconds per flight), average times flown level during climb are 13.9 seconds per flight lower in Greece. Athens (LGAV) has an average time flown level of 20.9 seconds per flight during climb.

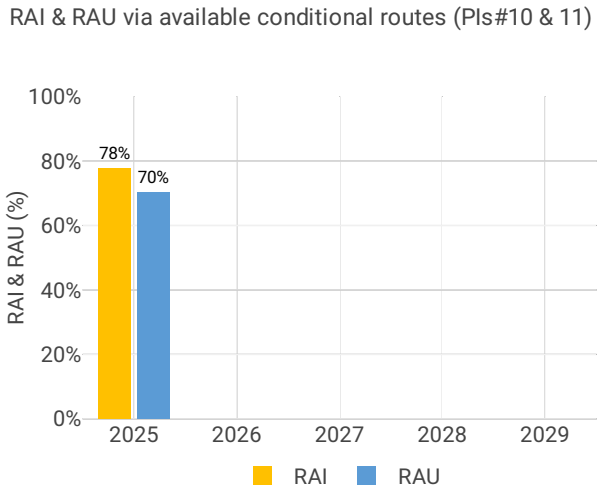
Regarding initiatives implemented or planned that will improve this PI and how does the NSA intend on monitoring their effectiveness on performance, the NSA reports: *"Within the framework of the ATHENIAN Project, new Performance-Based Navigation (PBN) procedures are being developed*

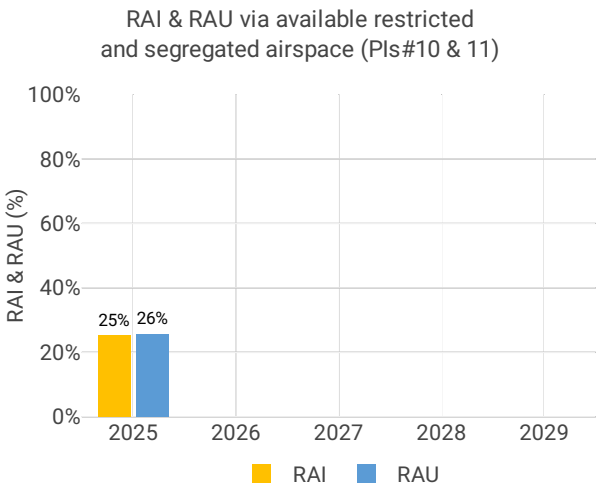
in order to improve traffic flows and enhance flight efficiency. The ATHENIAN Project is expected to be completed in 2028."

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
Athens	20.9	NA	NA	NA	NA	73.7	NA	NA	NA	NA

3.4 Civil-Military dimension







Focus on Civil-Military dimension

Effective use of reserved or segregated local airspace

GREECE, there was no data reported.

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: *"The ANSP is progressing with the implementation of the LARA system in order to optimise airspace management and further*

enhance the application of FUA principles. LARA is expected to improve civil-military coordination, increase the effective use of reserved and segregated airspace, and support more efficient planning through available airspace structures. The NSA will monitor the implementation and effectiveness of this initiative through regular performance oversight and the review of the relevant environmental performance indicators."

Rate of planning via available airspace structures

GREECE, there was no data reported.

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: *"The ANSP is progressing with the implementation of the LARA system in order to optimise airspace management and further*

enhance the application of FUA principles. LARA is expected to improve civil-military coordination, increase the effective use of reserved and segregated airspace, and support more efficient planning through available airspace structures. The NSA will monitor the implementation and effectiveness of this initiative through regular performance oversight and the review of the relevant environmental performance indicators."

Rate of using available airspace structures

GREECE, there was no data reported.

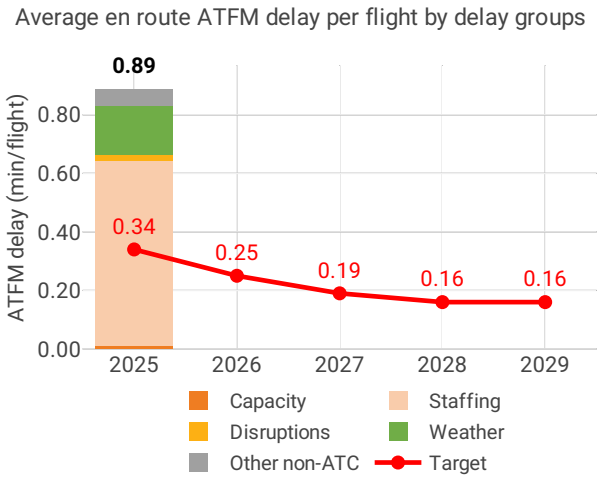
4 CAPACITY - GREECE

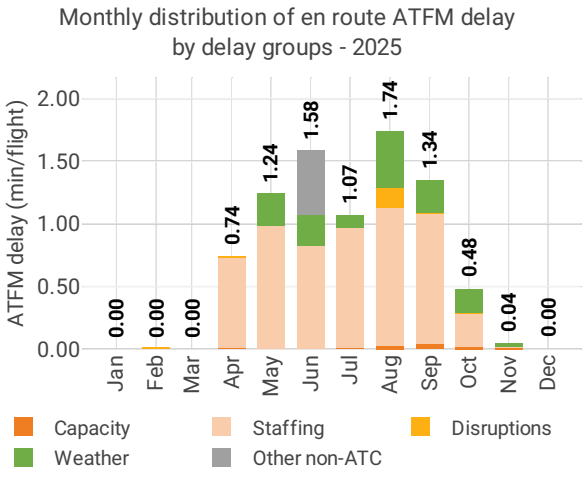
4.1 PRB monitoring

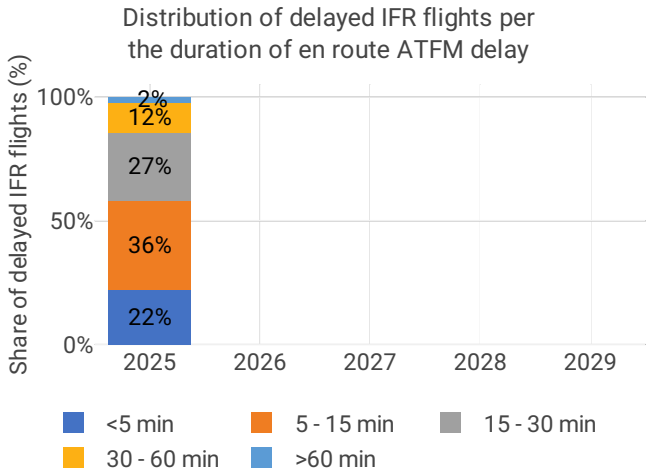
- Greece registered 0.90 minutes of average en route ATFM delay per flight during 2025, which has been adjusted to 0.89 during the post-ops adjustment process, thus not achieving the local target value of 0.34. Delays in Greece decreased by -0.08 minutes per flight year-on-year.
- Delays were highest in June and August, mostly driven by ATC staffing.
- The share of delayed flights with delays longer than 15 minutes in Greece decreased by -5 percentage points compared to 2024 and was lower than 2019 values.
- The number of ATCOs in OPS in Greece was 177 being below the 2025 plan by -23 FTE.
- The yearly total of sector opening hours in Athens and Makedonia ACCs was 58,255, showing a 4% increase compared to 2024.
- Athens and Makedonia ACCs registered 18.84 IFR movements per one sector opening hour in 2025, being 4% above 2024 levels.
- Greece registered an average airport arrival ATFM delay of 5.46 minutes per flight in 2025, thus not achieving the local target of 1.5 minutes. Compared to 2024, average arrival ATFM delays in Greece were 2.00 minutes per flight higher in 2025.
- The main drivers of delays were ATC capacity, accounting for 4.94 of the total delays, and other non-ATC causes, responsible for 0.22.

4.2 En route performance

4.2.1 En route ATFM delay (KPI#1)







Focus on en route ATFM delay

En route ATFM delay

- Greece had 1,146k flights in 2025, up from 1,075k flights in 2024.
- HASP applied en route ATFM regulations resulting in 1,032k minutes of delay, a reduction from the 1,051k minutes in 2024.
- As part of the strategic traffic re-orientation programme (S25/NTDM) operated by the Network Manager, 9k minutes of delay originating in Greece were re-attributed to other ANSPs.
- Under the auspices of the Route Network (RN) Scenarios during Capacity & Weather Based Operations between June and September 2025, an additional 4k minutes of en route ATFM delay were re-attributed to HASP – with 11k minutes of delay originating in Greece, being re-attributed to other ANSPs.
- When the above post-operations re-attributions are factored in, the total en route delay for HASP in 2025 was 1,016k minutes in 2025 down from 1,047k minutes in 2024.

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 traffic increase experienced in 2025 resulted in capacity-related delays; however, their impact was mitigated by the additional availability of ATCOs under the agreement on extra shifts for the 2025–2027 period, combined with high tactical flexibility and the use of advanced ATFCM techniques. The capacity increase achieved during summer 2025 exceeded the initially forecast operational levels, indicating that the system responded more effectively than originally anticipated.However it was not sufficient to recover the pre-existing capacity gap."*

Regarding the description of the adjustments to the capacity plan included in adopted performance plan, the NSA reports: *"The requirement for increased sector openings in 2026 will be partly addressed by the existing agreement for the period 2025-2027, the evolution of the recruitment plan, the planned airspace changes and the continuous flexibility in the use of advanced ATFCM."*

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 2025 capacity target was not met primarily due to ATC staffing and secondarily due to Weather."*

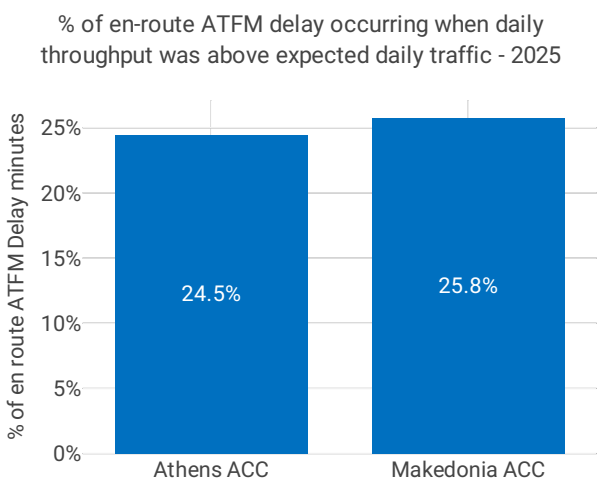
Regarding recommendations to the ANSP to rectify the situation, the NSA reports: *"Adequate personnel (mainly ATCOs), proper rostering to meet anticipated demand and modernisation of infrastructure."*

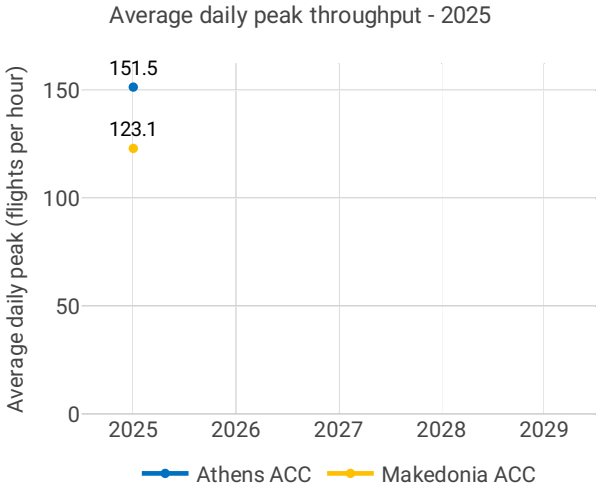
Regarding remedial measures that have been / will be taken by the ANSP to rectify the situation, the NSA reports: *"Materialisation of planned recruitment, modernisation of infrastructure, optional incentive to accelerate proper Capex deployment."*

Regarding follow up of the remedial measures indicated in the previous monitoring report(s), the NSA reports: *"Planned recruitment targets have not been met so far, modernisation of infrastructure still pending."*

En route capacity incentive scheme

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





Focus en route performance indicators at ACC level

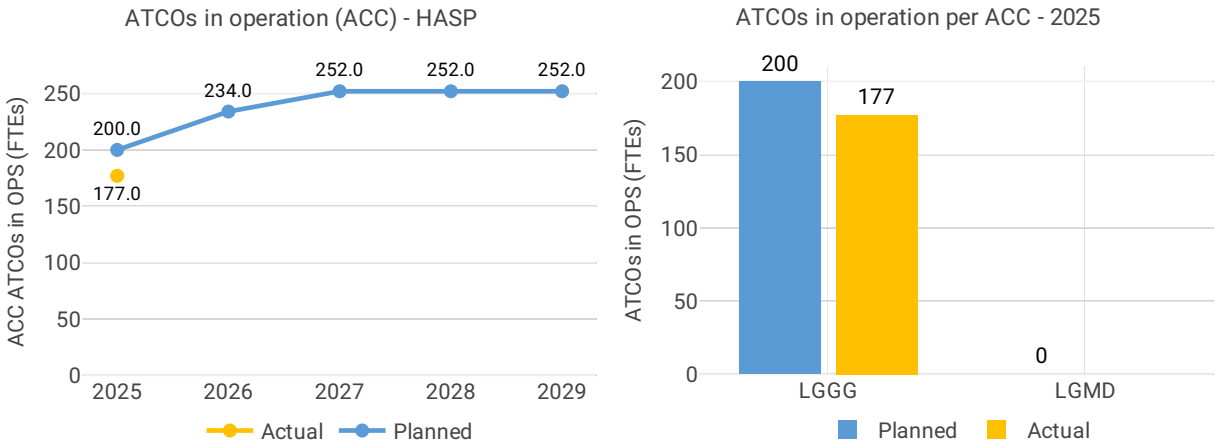
Percentage of total en route ATFM delay that occurred on days when the daily throughput was above the expected daily traffic

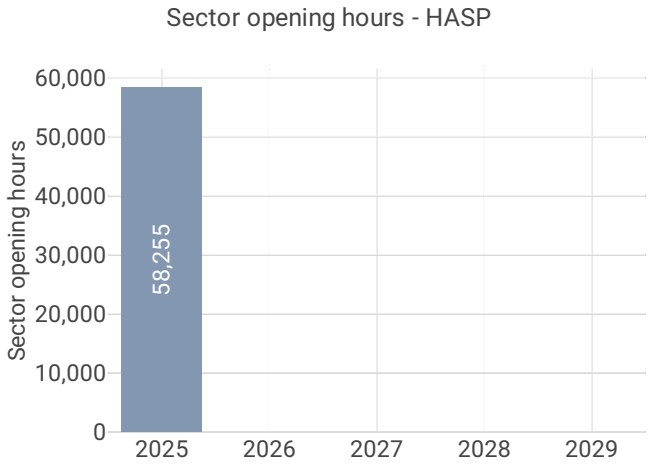
No comment provided.

Annual weighted average of the daily peak throughput

No comment provided.

4.2.3 Other en route information





Focus on other en route information

"The ACCs are physically co-located in terms of system and personnel, however the ATC procedures, staff and corresponding infrastructure throughout Greece concerns two distinct ACCs."

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: *"Allocation among ACC, APP and TWR positions is conducted prior to the qualification of ATCOs during their initial training based on the operational needs and the recruitment plan of HASP.The training process is in accordance with the provisions of EE 2015/340 as amended and in force and the relevant AMC of EASA and fully described in the relevant UTPs. All training is conducted in-house since HASP is certified by HCAA as an ATCO Training Organisation. The training programmes provided are:*

-ATCO INITIAL TRAINING (BASIC+RATING)

-UNIT TRAINING (TRANSITIONAL-pre-OJT-OJT)

- CONTINUATION TRAINING (REFRESHER+CONVERSION)

- OJTI/STDI TRAINING

-ASSESSOR TRAINING

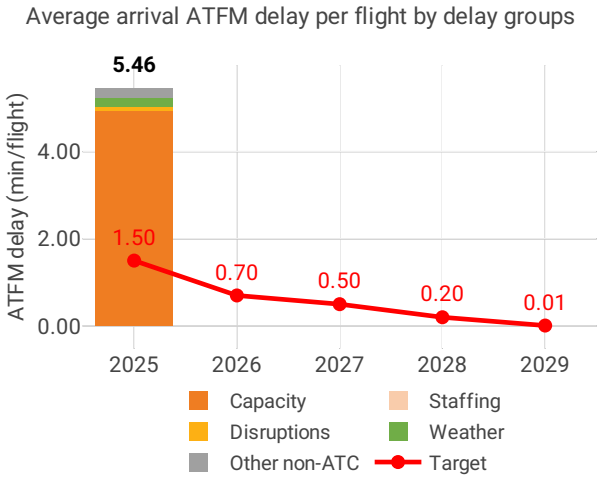
All above trainings are conducted according to the provisions of (EU) 2015/340, (EU) 2018/1139, ICAO Annex 1, Personnel Licensing.

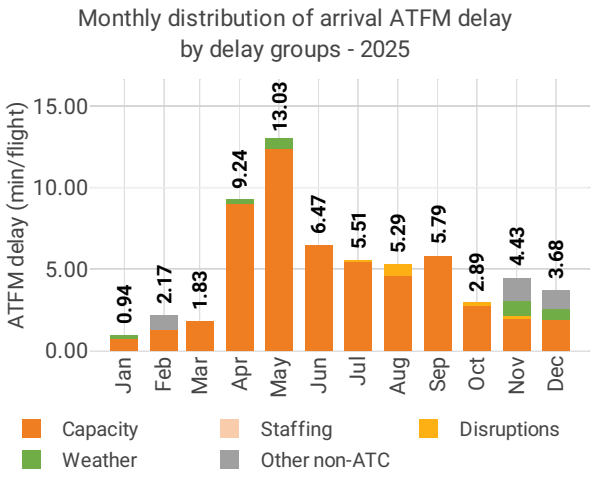
Initial training for ATCOs lasts six to seven months and the unit training one to three years depending to the complexity of the unit, the provided services , the number of the necessary ratings/endorsements according to the UTPs e.tc.

Moreover all Greek ATCOs are highly qualified university graduates, succeeding in a demanding recruiting process and therefore the failure rate is minimal."

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 Greece was 5.46 min/arr in 2025, the first year of RP4. The performance has worsened compared to 2024, last year of RP3, when there were 3.46 min/arr.

The 2025 result was the highest of all SES states, and it was driven by a mismatch between demand and ATC capacity, plus occasional weather issues. The peak value for a month was reached in May 2025, with 13.03 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 primary cause of the delays was excessive demand. In order to improve the situation, the following mitigation measures were adopted: additional availability of ATCOs in line with the agreement on extra shifts for the period 2025–2027, enhanced tactical flexibility, the application of advanced ATFCM techniques, and the use of PBN procedures."*

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: *"Airport and terminal capapcity was not met primarily due to ATC capacity and staffing and secondarily due to Weather and ATC dispruptions."*

Regarding recommendations to the ANSP to rectify the situation, the NSA reports: *"Adequate personnel (mainly ATCOs), proper rostering to meet anticipated demand and modernisation of infrastructure."*

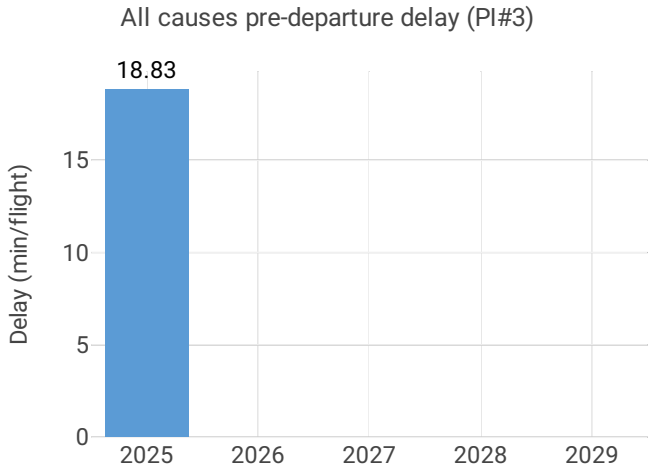
Regarding remedial measures that have been / will be taken by the ANSP to rectify the situation, the NSA reports: *"Materialisation of planned recruitment, modernisation of infrastructure, optional incentive to accelerate proper Capex deployment."*

Regarding follow up of the remedial measures indicated in the previous monitoring report(s), the NSA reports: *"Planned recruitment targets have not been met so far, modernisation of infrastructure still pending."*

Terminal capacity incentive scheme

In the first year of RP4, with an ATFM arrival delay of 5.46 min/arr, Greece did not achieve the national target of 1.5 min/arr. The KPI falls beyond the end of the penalty sliding range for the incentive scheme, meaning that the maximum penalty of 1.5% applies. As such, the NSA computes a penalty of -€393,906.72.

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**
Athens	5.46	NA	NA	NA	NA	92.5%	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**
Athens	NA	NA	NA	NA	NA	18.8	NA	NA	NA	NA

Focus on other terminal performance indicators

ATFM slot adherence

ATFM slot adherence in 2025 was equal to 92.5%, very close than the 2024 value – last year of RP3 – of 92.4%. With regard to the 7.5% of flights that did not adhere, 3.8% were early and 3.7% were late.

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

ATC pre-departure delay

The conditions to calculate ATC pre-departure delay were not met at Athens airport.

The calculation of the ATC pre-departure delay is based on the data provided by the airport operators through the Airport Operator Data Flow (APDF) which is properly implemented at Athens.

However, there are several quality checks before EUROCONTROL can produce the final value which is established as the average minutes of pre-departure delay (delay in the actual off block time) associated to the IATA delay code 89 (through the APDF, for each delayed flight, the reasons for that delay have to be transmitted and coded according to IATA delay codes.

However, sometimes the airport operator has no information concerning the reasons for the delay in the off block, or they cannot convert the reasons to the IATA delay codes. In those cases, the airport operator might:

- Not report any information about the reasons for the delay for that flight (unreported delay)
- Report a special code to indicate they do not have the information (code ZZZ)
- Report a special code to indicate they do not have the means to collect and/or translate the information (code 999)

To be able to calculate with a minimum of accuracy the PI for a given month, the minutes of delay that are not attributed to any IATA code reason should not exceed 40% of the total minutes of pre-departure delay observed at the airport.

Finally, to be able to produce the annual figure, at least 10 months of valid data is requested by EUROCONTROL.

All causes pre-departure delay

The delay in 2025 decreased to 18.83 min/dep, lower than the value of 2024 – last year of RP3 – of 19.53 min/dep.

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

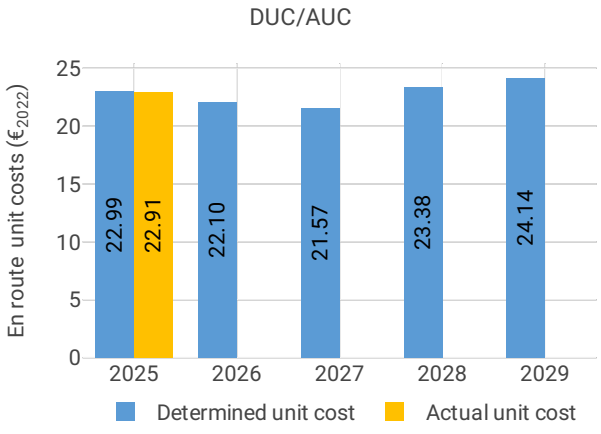
5 COST-EFFICIENCY - GREECE

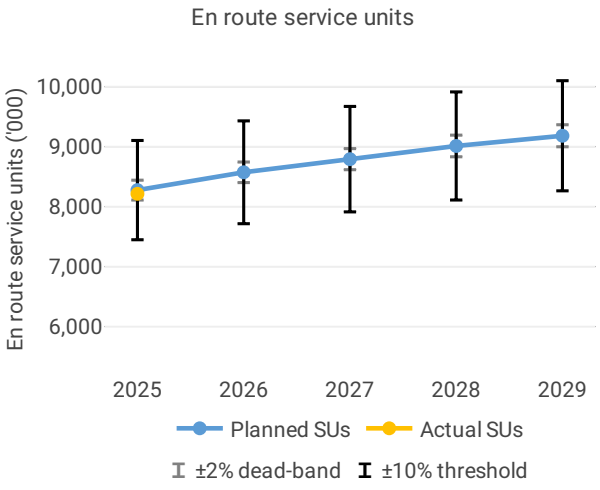
5.1 PRB monitoring

- The en route 2025 actual unit cost of Greece was 22.91€2022, -0.3% lower than the determined unit cost (22.99€2022). The terminal 2025 actual unit cost was 149.54€2022, +1.0% higher than the determined unit cost (148.00€2022).
- The en route 2025 actual service units (8.2M) were -0.7% lower than the determined service units (8.3M).
- The en route 2025 actual total costs were -2.1M€2022 (-1.1%) lower than determined. This is mainly due to lower other operating costs for all entities (-2.7M€2022, or -8.1%). The NSA noted that it is mainly due to payments of HASP that were incurred on a cash basis, lower operational, training and travel expenses for MET, and a more efficient utilization of assets by NSA SAR. This was partially compensated by higher staff costs than planned for the NSA SAR (+1.1M€2022, or +37.0%), due to new laws for Hellenic Air Force Staff and Cost Guard.
- For the timely implementation of the investment plan, the NSA reports that *"a decision at ministerial level was taken in collaboration with the Commission and EASA, in order to map an action plan for monitoring the investment plan with reporting every six weeks."* However, HASP spent 1.7M€2022 in 2025 related to costs of investments for both en route and terminal charging zones, -12.9% less than determined (2.0M€2022). According to the NSA, this reduction is due to a delay in the implementation of projects expected to be put into operation in 2026 instead of 2025.
- The en route actual unit cost incurred by users in 2025 was 25.86€ (+3.5% above the 2025 DUC), while the terminal actual unit cost incurred by users was 160.05€ (-1.1% below the 2025 DUC). The difference between the AUCU and the DUC for the en route charging zone is mainly driven by the investment costs in cost exempt from cost sharing.

5.2 En route charging zone

5.2.1 Unit cost (KPI#1)

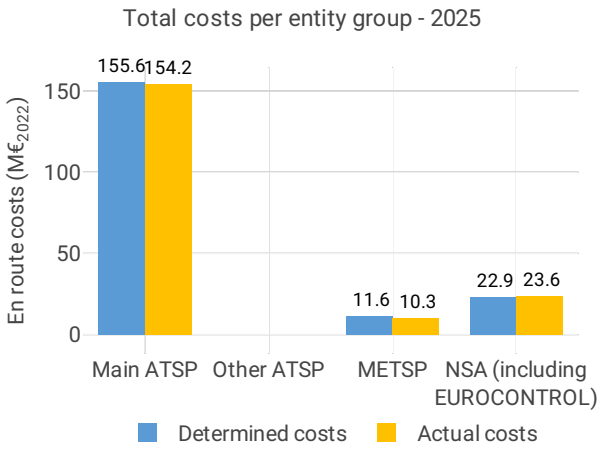


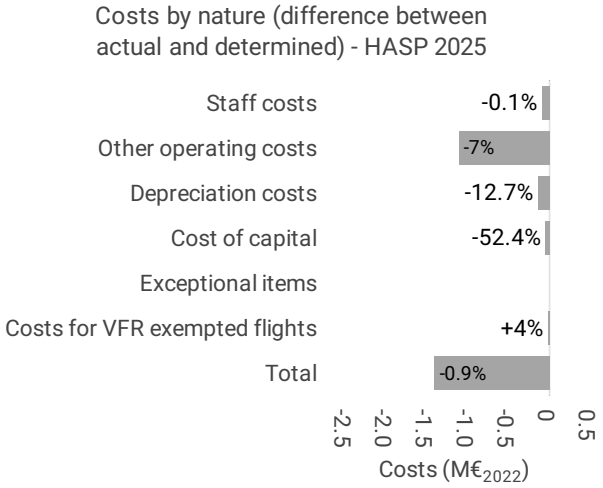


Actual and determined data					
Total costs - nominal (M€)	**2025**	**2026**	**2027**	**2028**	**2029**
Determined costs	206.7	209.4	213.1	237.9	252.5
Actual costs	205.2	NA	NA	NA	NA
Difference costs	-1.5	NA	NA	NA	NA

Inflation assumptions	**2025**	**2026**	**2027**	**2028**	**2029**
Determined inflation rate	2.4%	2.1%	2.0%	2.0%	2.0%
Determined inflation index*	109.9	112.2	114.5	116.8	119.1
Actual inflation rate	2.9%	NA	NA	NA	NA
Actual inflation index*	110.4	NA	NA	NA	NA
Difference inflation index (p.p.)	+0.5	NA	NA	NA	NA

*100 = 2022





Focus on unit cost

AUC vs. DUC

In 2025, the en route AUC was -0.3% (or -0.08 €2022) lower than the planned DUC. This results from the combination of lower than planned en route costs in real terms (-1.1%, or -2.1 M€2022) and slightly lower than planned TSUs (-0.7%).

En route service units

The difference between actual and planned TSUs (-0.7%) falls inside the ±2% dead-band. Hence, the loss of en route revenues is borne by the ANSPs.

En route costs by entity

Actual real en route costs are -1.1% (-2.1 M€2022) lower than planned. This is the result of lower costs for the main ANSP, HASP (-0.9%, or -1.4 M€2022) and the MET service provider (-11.3%, or -1.3 M€2022) and higher costs for the NSA/EUROCONTROL (+2.8%, or +0.7 M€2022).

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

The slightly lower than planned en route costs in real terms for HASP in 2025 (-0.9%, or -1.4 M€2022) result from:

- Staff costs consistent with those planned (-0.1%);
- Significantly lower than planned other operating costs (-7.0%);
- Significantly lower than planned depreciation (-12.7%);
- Significantly lower than planned cost of capital (-52.4%); and,
- Higher than planned deduction for VFR exempted flights (+4.0%).

No explanations on the differences between the 2025 determined and actual costs are available in the Additional information to the reporting tables or in the NSA Monitoring Report.

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

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

"*There is a marginal decrease in actual real en route unit cost compared with the determined one.*"

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

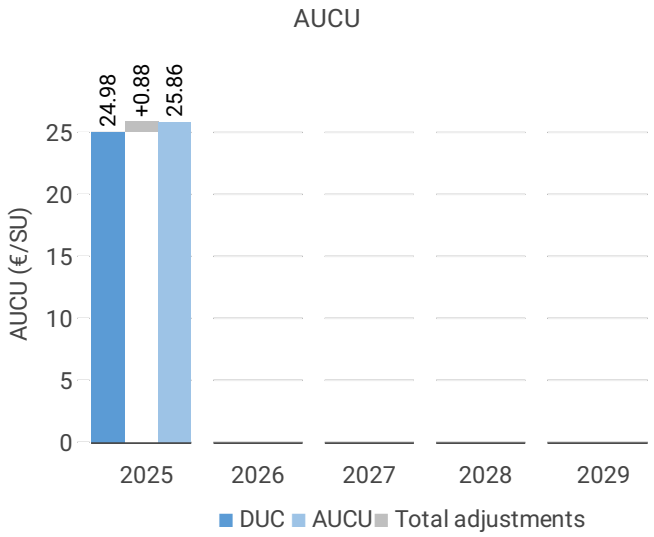
The NSA provides the following explanation for the differences between actual and determined costs in the charging zone:

"*There is a small decrease in total en route costs in real terms mainly due to lower actual SU and higher actual inflation.*"

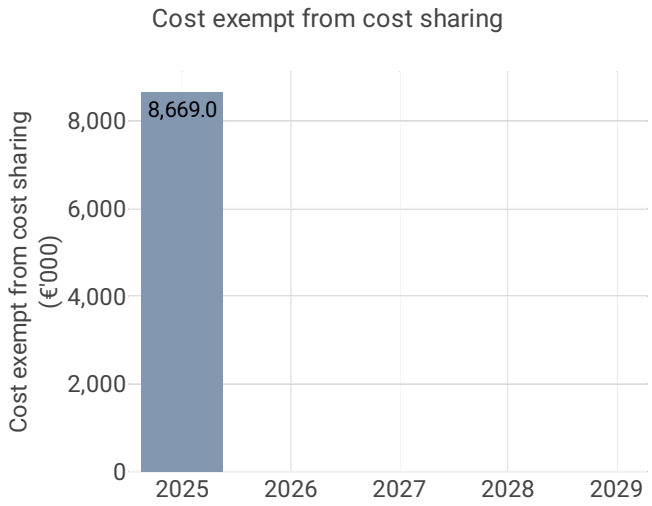
Recommendations formulated by the NSA to the ANSP (HASP) to rectify the situation and actions taken by the ANSP

No information was provided in the NSA 2025 Monitoring Report.

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	**24.98**
Inflation adjustment	0.10
Cost exempt from cost sharing	1.06
Traffic risk sharing adjustment	0.00
Traffic adjustment (costs not TRS)	0.03
Financial incentives	-0.31
Modulation of charges	0.00
Cross-financing	0.00
Other revenues	0.00
Application of lower unit rate	0.00
Total adjustments	0.88
AUCU	**25.86**
AUCU vs. DUC	**+ 3.5%**



Cost exempt from cost sharing – 2025		
Cost exempt from cost sharing by item - 2025	**€'000**	**€/SU**
New and existing investments	-192.5	-0.02
Competent authorities and qualified entities costs	741.1	0.09
Eurocontrol costs	-90.9	-0.01
Pension costs	8,211.4	1.00
Interest on loans	0.0	0.00
Changes in law	0.0	0.00
Total cost exempt from cost risk sharing	**8,669.0**	**1.06**

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 (25.86 €) is +3.5% higher than the nominal DUC (24.98 €) which includes DUC initially charged: 26.59 €, and DUC to be charged retroactively: -1.61 €. The difference between the AUCU and the nominal DUC (+0.88 €/SU) is due to:

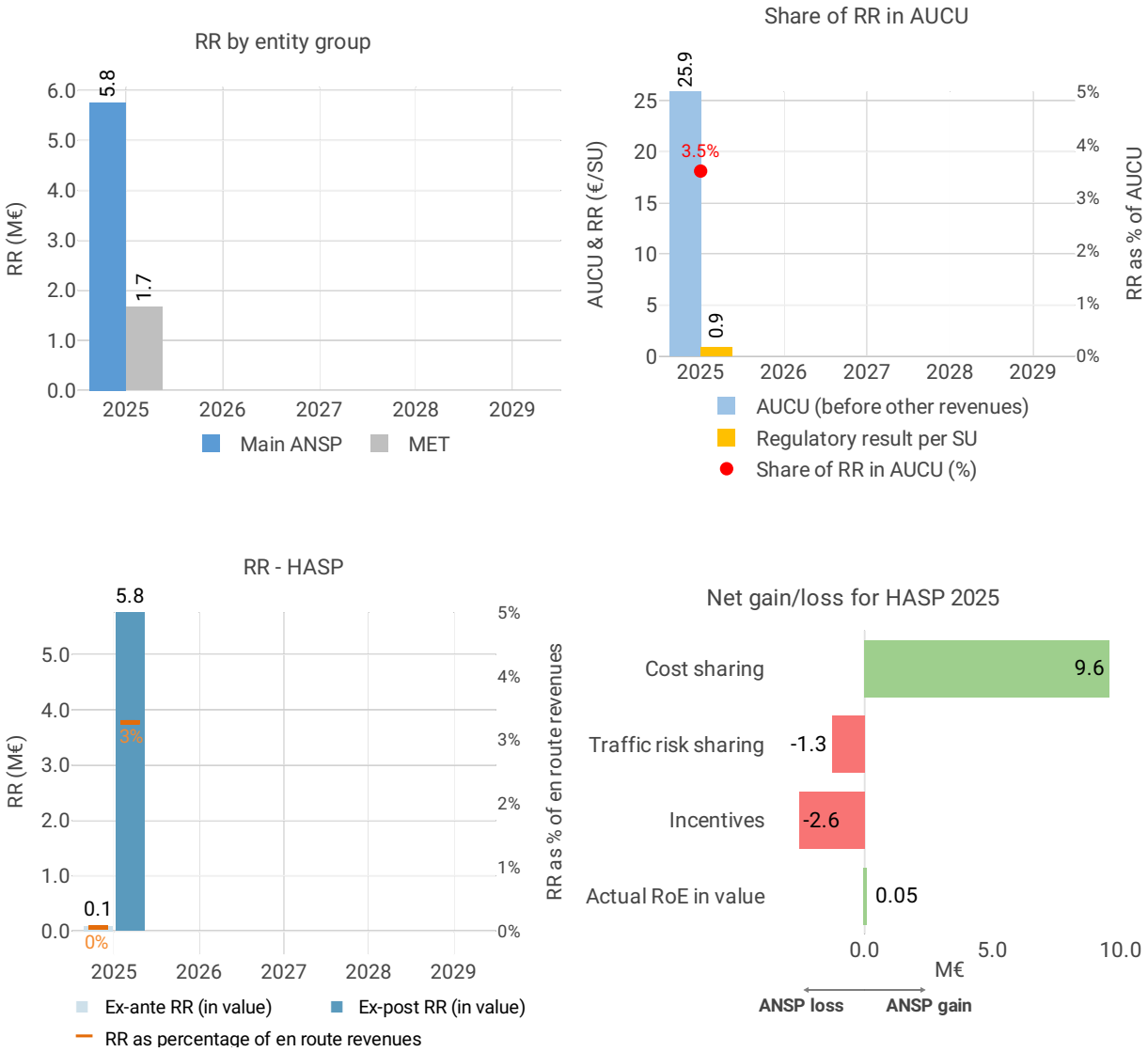
- the positive inflation adjustment resulting from higher than planned inflation (+0.10 €/SU);
- the impact of adjustments resulting from the costs exempted from cost sharing mechanism (+1.06 €/SU);
- the addition of the traffic adjustment (+0.03 €/SU) for the costs not subject to traffic risk sharing; and,
- the impact of financial incentives (-0.31 €/SU).

The share of the regulatory result (see next sub-section) in the AUCU (before the deduction of other revenues) is 3.5%.

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

HASP net gain/loss on activity in the Greece en route charging zone in 2025

HASP reported a net gain of +5.7 M€, as a combination of a gain of +9.6 M€ arising from the cost sharing mechanism, with a loss of -1.3 M€ arising from the traffic risk sharing mechanism and a loss of -2.6 M€ relating to financial incentives.

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

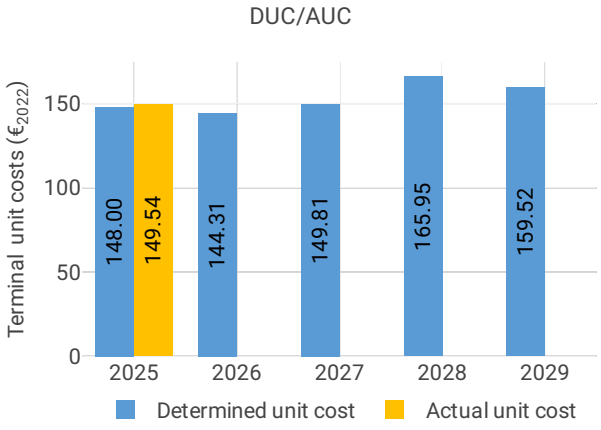
Ex-post, the overall RR, taking into account the net gain from the en route activity mentioned above (+5.7 M€) and the actual RoE amounts to +5.8 M€ (3.3% of the en route revenues). The resulting ex-post rate of return on equity is 592.6%, which is much higher than the 4.6% planned in the PP (see also Note 1 below).

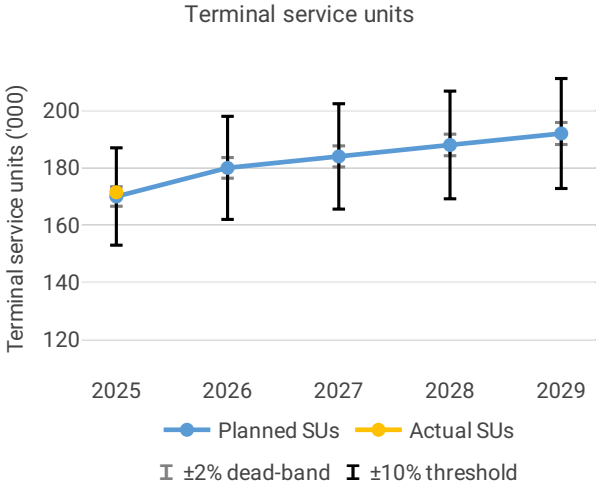
Note 1

The ex-post RoE cannot be correctly calculated because of a very low total asset base which results from: 1) the exclusion of net current assets from the calculation of the total asset base, and 2) a very low net book value of existing fixed assets in operation.

5.3 Terminal charging zone

5.3.1 Unit cost (KPI#1)

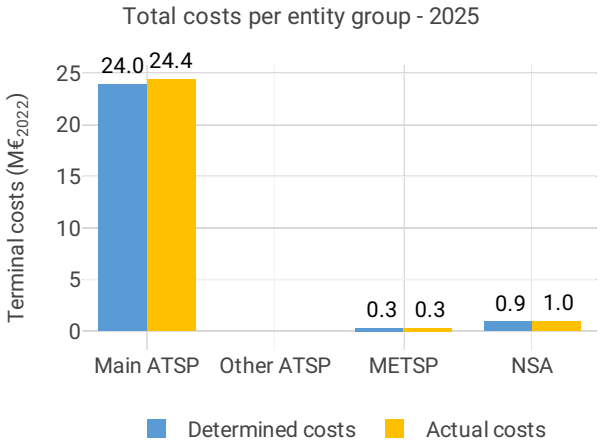


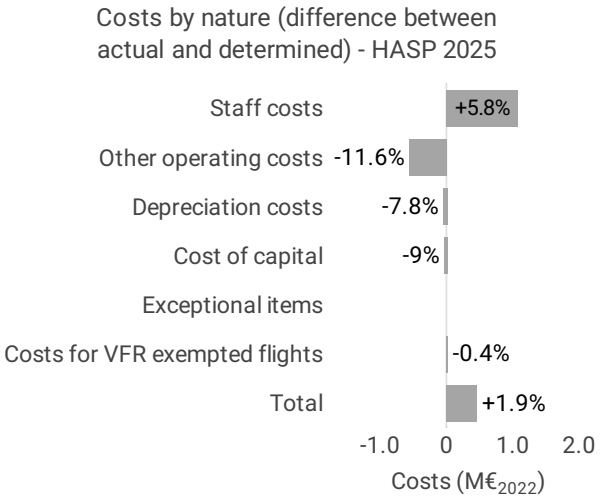


Actual and determined data					
Total costs - nominal (M€)	**2025**	**2026**	**2027**	**2028**	**2029**
Determined costs	27.5	28.8	31.0	35.3	35.3
Actual costs	28.1	NA	NA	NA	NA
Difference costs	0.7	NA	NA	NA	NA

Inflation assumptions	**2025**	**2026**	**2027**	**2028**	**2029**
Determined inflation rate	2.4%	2.1%	2.0%	2.0%	2.0%
Determined inflation index*	109.9	112.2	114.5	116.8	119.1
Actual inflation rate	2.9%	NA	NA	NA	NA
Actual inflation index*	110.4	NA	NA	NA	NA
Difference inflation index (p.p.)	+0.5	NA	NA	NA	NA

*100 = 2022





Focus on unit cost

AUC vs. DUC

In 2025, the terminal AUC was +1.0% (or +1.54 €2022) higher than the planned DUC. This results from the combination of higher than planned terminal costs in real terms (+1.9%, or +0.5 M€2022) and slightly higher than planned TNSUs (+0.9%).

Terminal service units

The difference between actual and planned TNSUs (+0.9%) falls inside the ±2% dead-band. Hence, the gain of additional terminal revenues is kept by the ANSPs.

Terminal costs by entity

Actual real terminal costs are +1.9% (+0.5 M€2022) higher than planned. This is the result of higher costs for the main ANSP, HASP (+1.9%, or +0.5 M€2022) and the NSA (+6.3%, or +0.1 M€2022) and lower costs for the MET service provider (-12.5%).

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

Based on the additional information to the terminal reporting tables, the slightly higher than planned terminal costs in real terms for HASP in 2025 (+1.9%, or +0.5 M€2022) result from:

- Significantly higher than planned staff costs (+5.8%), mainly driven by an increase in staff numbers.
- Significantly lower than planned other operating costs (-11.6%).
- Significantly lower than planned depreciation (-7.8%), mainly due to a delay in the implementation of two projects for Athens International Airport ”Eleftherios Venizelos”, which are expected to be put into operation in 2026 instead of 2025 as originally planned.
- Significantly lower than planned cost of capital (-9.0%), mainly due to the delay in the implementation of the investment plan.
- Slightly lower than planned deduction for VFR exempted flights (-0.4%).

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

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

"*There is a small increase in the actual real terminal unit cost compared with the determined one.*"

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

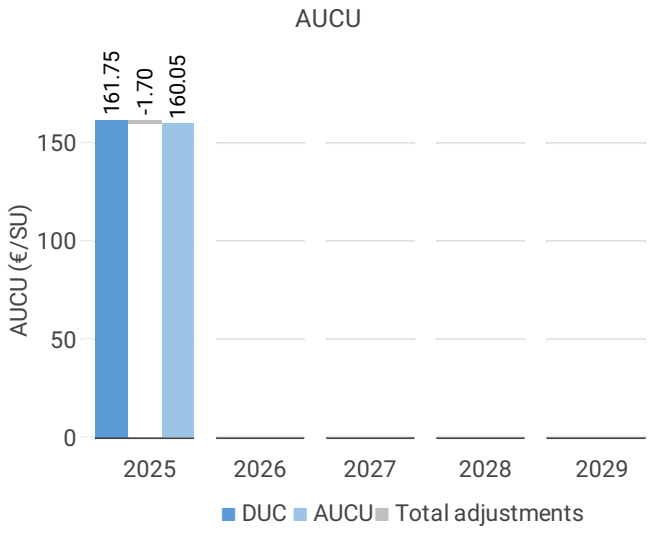
The NSA provides the following explanation for the differences between actual and determined costs in the charging zone:

"*Actual total terminal costs in real terms are 1.9% higher due to higher staff costs and higher than anticipated inflation.*"

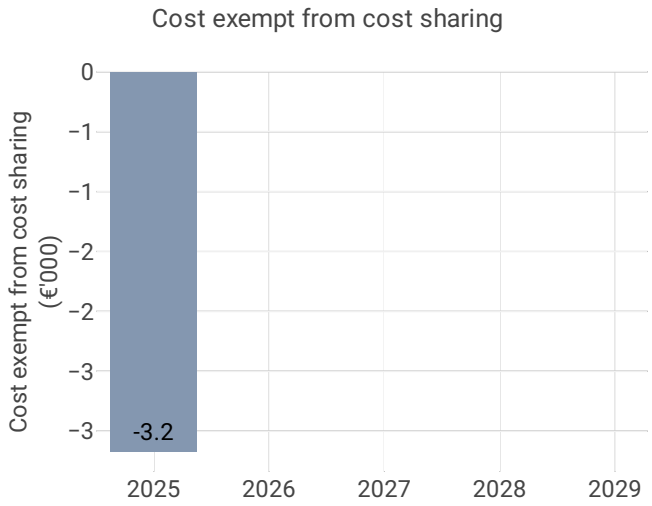
Recommendations formulated by the NSA to the ANSP (HASP) to rectify the situation and actions taken by the ANSP

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	**161.75**
Inflation adjustment	0.68
Cost exempt from cost sharing	-0.02
Traffic risk sharing adjustment	0.00
Traffic adjustment (costs not TRS)	-0.06
Financial incentives	-2.30
Modulation of charges	0.00
Cross-financing	0.00
Other revenues	0.00
Application of lower unit rate	0.00
Total adjustments	-1.70
AUCU	**160.05**
AUCU vs. DUC	**-1.1%**



Cost exempt from cost sharing – 2025		
Cost exempt from cost sharing by item - 2025	**€'000**	**€/SU**
New and existing investments	-60.0	-0.35
Competent authorities and qualified entities costs	56.8	0.33
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	**-3.2**	**-0.02**

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 (160.05 €) is -1.1% lower than the nominal DUC (161.75 €), which includes DUC initially charged: 175.45 €, and DUC to be charged retroactively: -13.70 €. The difference between the AUCU and the nominal DUC (-1.70 €/SU) is due to:

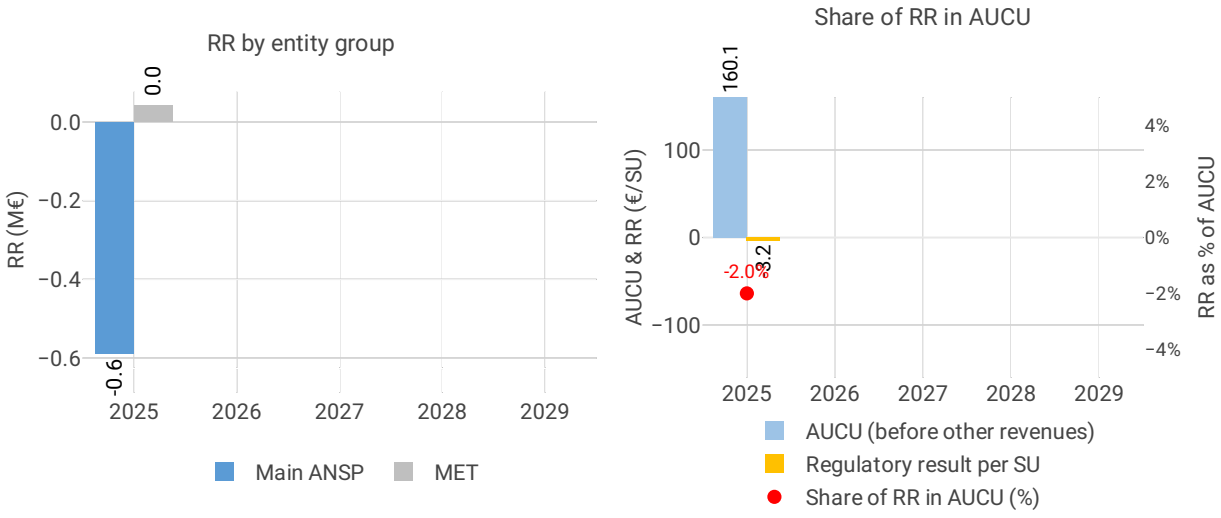
- the positive inflation adjustment resulting from higher than planned inflation (+0.68 €/SU);
- the impact of adjustments resulting from the costs exempted from cost sharing mechanism (-0.02 €/SU);
- the deduction of the traffic adjustment (-0.06 €/SU) for the costs not subject to traffic risk sharing; and,
- the impact of the financial incentives (-2.30 €/SU).

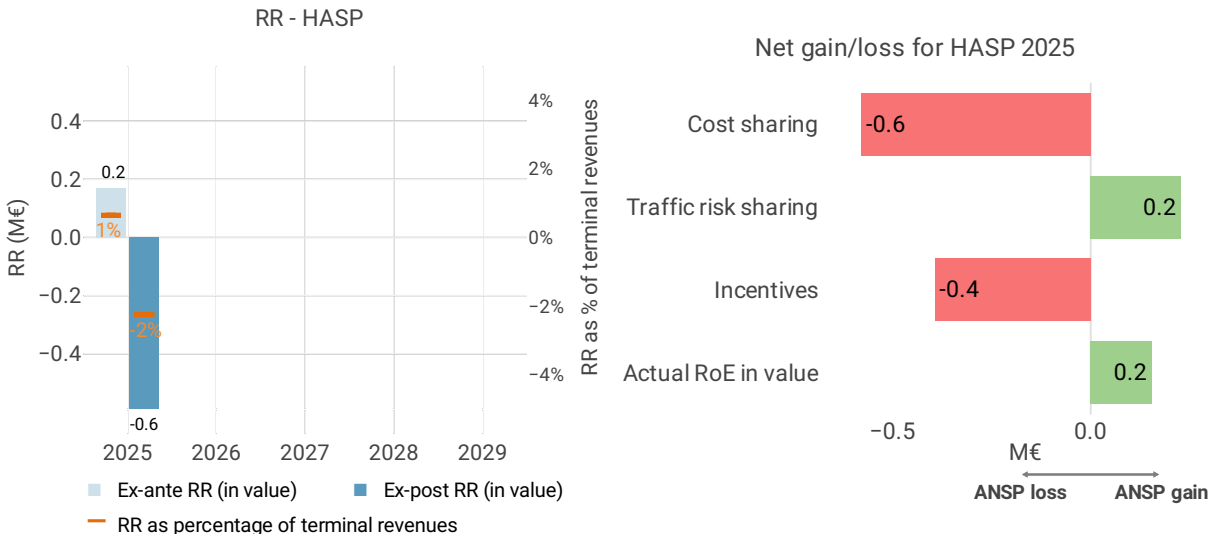
The share of the regulatory result (see next sub-section) in the AUCU (before the deduction of other revenues) is -2.0%.

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

HASP net gain/loss on activity in the Greece terminal charging zone in 2025

HASP reported a net loss of -0.7 M€, as a combination of a loss of -0.6 M€ arising from the cost sharing mechanism, with a gain of +0.2 M€ arising from the traffic risk sharing mechanism and a loss of -0.4 M€ relating to financial incentives.

HASP 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 (-0.7 M€) and the actual RoE (+0.2 M€), amounts to -0.6 M€ (-2.3% of the terminal revenues). The resulting ex-post rate of return on equity is negative (-17.6%), compared to the 4.6% planned in the PP.